

# Exhibit D

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA BARBOUNIS,	) CIVIL ACTION - LAW
	)
Plaintiff	)
	)
-vs-	) NO. 2:19-cv-05030
	)
THE MIDDLE EAST FORUM, et	)
al.,	)
	)
Defendants	)
	X

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\* \* \*

The recorded video deposition of GREGG ROMAN,  
taken remotely via Zoom, on Friday, November 20,  
2020, beginning at 11:28 a.m., before Carrie A.  
Kaufman, Registered Professional Reporter and Notary  
Public in and for the Commonwealth of Pennsylvania.

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Everest Court Reporting  
Video Specialist

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Matthew Mainen (Via Zoom)  
Marc Fink (Via Zoom)  
Lisa Reynolds Barbounis (Via Zoom)

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1	THE VIDEO SPECIALIST: We are now 2 on the record. Today's date is Friday, 3 November 20th, 2020, and the time is 4 11:28 a.m. Eastern.  5 This is the recorded video 6 deposition of Gregg Romano in the matter 7 of Lisa Barbounis versus Middle East 8 Forum, et al., in the United States 9 District Court, Eastern District of 10 Pennsylvania, Case Number 2:19-CV-05030-GAM.  11 My name is Margaret Susuni, and 12 I'm with Everest Court Reporting, and 13 I'm the video specialist. The court 14 reporter today is Carrie, also from 15 Everest Court Reporting.  16 All counsel appearing today will 17 be noted on the stenographic record.  18 Will the court reporter please 19 swear in the witness.  20 - - - 21 G R E G G    R O M A N 22 WAS CALLED AND HAVING BEEN DULY SWORN 23 WAS EXAMINED AND TESTIFIED AS FOLLOWS: 24 - - - 25 MR. CARSON: So we're back on the	I gave, I'll just start by asking you to please state 1 your full name for the record. 2 A. Gregg, G-r-e-g-g, Eric, E-r-i-c, Roman, 3 R-o-m-a-n. 4 Q. Okay. And I think you said you have 5 another name that you're known by. Do you want to 6 please say that name as well? 7 A. Sure. It's my Israeli name, which is 8 -- I'll say it rather fast and I'll break it down for 9 you. Gavriel Yisrael Ben Ze'ev Halevi Vi'adal. 10 Okay? G-a-v-r-i-e-l, space, Y-i-s-r-a-e-l, space, 11 B-e-n, space, Ze'ev, Z-e-'-e-v, space, H-a-l-e-v-i, 12 space, Vi'adal, V-i-'-a-d-a-l. That's it. 13 Q. Okay. And you said earlier you were 14 born in Lexington, Kentucky, on May 21st, 1985, 15 correct? 16 A. That's correct. 17 Q. And your educational background, I 18 think you said it began at Medill Bair High School in 19 ninth grade; is that correct? 20 A. Well, it began when I was -- before 21 then I -- the first place I ever studied wasn't 22 Medill Bair. I mean, I had elementary school, 23 kindergarten, middle school. But my secondary 24 education started in ninth grade at Medill Bair High
1	record and we had some technical 2 difficulties so this is going to be the 3 beginning of a deposition transcript.  4 One correction. The witness's 5 name, the party's name, is Gregg Roman, 6 R-o-m-a-n, so -- I think -- I think you 7 said Romano before, so I just wanted to 8 let you know it's Roman.  9 And we started the deposition with 10 some instructions for today. I'm not 11 going to go through them all again 12 because Mr. Roman has heard them, but I 13 will just ask, Mr. Roman, you are aware 14 that you're under oath and your 15 testimony today has the same force and 16 effect as if you were appearing at a -- 17 you know, in a trial, at a courtroom, 18 you're under oath, and so you have an 19 obligation to tell the truth today; you 20 understand that.  21 THE WITNESS: Yes. 22 - - - 23 EXAMINATION 24 BY MR. CARSON: 25 Q. So subject to the earlier instructions	School in the Pennsbury School District in Fairless 1 Hills, Pennsylvania. 2 Q. And are you a graduate of Pennsbury 3 High School? 4 A. No, I went to three high schools, so I 5 was getting into this, and this is sort of like, you 6 know, a theme that's formative from education and 7 kind of connects later on, but -- so Medill Bair High 8 School wasn't until ninth grade. I was a pretty good 9 wrestler, folkstyle wrestler, in high school. So I 10 went from Medill Bair to a private school in 11 Princeton, New Jersey, called the Hun School, H-u-n 12 School. I was there for tenth and eleventh grade. 13 And then as a result of recruiters from different 14 universities saying, look, you can try to do a prep 15 school or you can try to go back in the public 16 school, I was already in the NJISAA, which is the 17 sort of New Jersey sports association, so I decided 18 to go to a public school in Jersey, which was 19 Hopewell Valley Regional High School, HVRSD, in 20 Mercer County, and from there I graduated. So I 21 graduated from Hopewell Valley Regional School 22 District in 2003. I guess -- do you want me to 23 continue with college and stuff or what? 24 Q. Sure. Sure. Go ahead. Tell me what
1	Page 5	Page 7

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<p>1 your educational background is after high school.      2 A. Sure. So I attended the American      3 University in Washington D.C. from I guess August of      4 2003 to December of 2005, and during that time I had      5 about like four or five other educational programs.      6 I was in Yeshiva, which is sort of like a Jewish      7 seminary, in Jerusalem, in December of 2004, I was in      8 -- sort of like a field school from the Jewish      9 agency, which is a quasi-governmental organization in      10 Israel, in Haifa and in Jerusalem, and I had all      11 these different experiences over there, so I decided      12 to move from Washington to Israel, in the middle east      13 Israel, in -- I guess the decision was reached in      14 December of '05, and I made the move to study an      15 intensive Hebrew and Arabic program at Haifa      16 University -- Haifa is H-a-i-f-a -- in July of 2006,      17 but about two days after I moved there the Second      18 Lebanon War broke out. So I went from Haifa      19 University to learn academics and I actually became a      20 firefighter in Israel, and I attended the basically      21 quickest fire academy, if you want to call it that,      22 or rescue academy, for what's called Ichud Hatzalah,      23 which is the rescue service in Israel, where I was a      24 member of the civil guard, and that civil guard --      25 and this is still educational, Mr. Carson, it's not</p>	<p>1 and that took place in July of 2010 I think, and then      2 I got out of the army and went to the Ministry of      3 Defense Reserves in October of 2010, I want to say,      4 and then I went back to the IDC Herzliya, which was      5 the college that I was at prior to my army      6 enlistment, and I stopped studying -- I was doing      7 political communications and national security      8 studies there until May of 2012 and -- my daughter      9 was born then, and then I stopped studying then to      10 take a job in Pittsburgh where I then continued my      11 studies at the Katz Graduate School of Business at      12 the University of Pittsburgh where I was a joint sort      13 of like lecturer and I audited classes. I have done      14 some continue education since there, but, Mr. Carson,      15 I never actually obtained my bachelor's degree, so I      16 have about seven years of college under my belt but      17 I'm missing those few credits to finish it. And so      18 that's education but doesn't include the professional      19 development. I just want to try to provide as clear      20 a -- complete an answer as possible.</p> <p>21 Q. No, that was a thorough answer for      22 sure. It sounds like you have a degree in the      23 college of life to me, but -- sometimes worth more      24 than a bachelor's degree, but let me jump forward      25 ahead and --</p>
<p>1 like -- you know, it's unconventional, okay, but it's      2 still -- I would categorize it as educational. So I      3 was a member of the civil guard's education program      4 from June of -- July of 2006 until about September of      5 2006, and then there in parallel I resumed my      6 university studies at a place called the      7 Interdisciplinary Center, IDC, Herzliya,      8 H-e-r-z-l-i-y-a, I did that for a year, and then I      9 actually got drafted -- I didn't volunteer, I got      10 drafted, into the Israeli Army, so my university      11 studies stopped there, and then I was first in a      12 basic training in a place called Nitzan, N-i-t-z-a-n,      13 which is in the south of the country, and then I went      14 to the school for government and -- this is all as      15 part of the Israeli Defense Forces, a place called      16 Rishon Lezion, R-i-s-h-o-n L-e-z-i-o-n, and that was      17 in December and January, December of 2008 and January      18 of 2009, and then Operation Cast Lead broke out, so      19 again a war interrupted with my studies, and I was on      20 the frontlines in a place called Sderot, S-d-e-r-o-t,      21 then the war ended, then I went back to the college      22 for government, part of the IDF, in February of 2009,      23 I graduated from that, and then I went to the school      24 for advanced Israeli and Judaic studies, which was      25 part of the Israel Defense Forces' education corps,</p>	<p>1 A. Sure.      2 Q. -- just kind of talk about your -- talk      3 about your -- your work history. I see that you went      4 to the University of Pittsburgh for a year?      5 A. I didn't go to the University of      6 Pittsburgh, I taught at the University of Pittsburgh      7 and audited classes, but that was like -- to really      8 understand that, you have to understand the      9 educational -- so I've had like three professional      10 lines here. Okay? One was government, the second      11 was academic, and the third is private.      12 Q. Is it around the -- tell me when you      13 were teaching at the University of Pittsburgh,      14 please.      15 A. So it was a class called scenario      16 planning, which is sort of like the combination of      17 politics and strategy and how it applies to business      18 decisions, and that was I want to say -- I want to      19 say it was probably spring of 2013, and -- but then I      20 had a course that I did through the Hillel Jewish      21 University Center, which was after that -- Hillel is      22 an online -- not online, it's a Jewish university --      23 I mean -- how -- what's the best way to describe it.      24 Jewish campus life. Right? So I had multiple years      25 of involvement with that, but at Katz specifically</p>

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<p>1 was there January -- it was either January 2013 or      2 September 2013, it was either the spring semester or      3 that fall, but I had involvement with the school as      4 what they call an executive lecturer, guest lectures,      5 doing programs. We had an incubator that we ran from      6 the Pittsburgh Israel Business Council. So I was      7 involved with the school for about three years.      8 Okay? But as a functional lecturer there was      9 probably only one or two semesters. I judged      10 competitions every semester, but, you know, the      11 involvement -- let's just say this. It started when      12 I moved to Pittsburgh in the fall of 2012 and it went      13 through September of 2015 when I ran my last external      14 lecture program through Hillel Jewish University      15 Center.</p> <p>16 Q. And it was around that time that you      17 also began your employment with the Jewish Federation      18 of Greater Pittsburgh?</p> <p>19 A. Yeah, that was in parallel. So there      20 was a partnership between the Jewish Federation of      21 Greater Pittsburgh and there is about four other      22 units, there is the Jewish University -- excuse me,      23 the Jewish Community Relations Council, JCRC; there      24 was the Urban Affairs Foundation, UAF; there was the      25 corporate equity roundtable, which was part of the</p>	<p>1 totally different management structures.      2 Q. So can you please just quickly kind of      3 compare your experience with the JCRC with the Middle      4 East Forum --      5 A. You want me to -- you want to compare      6 the JCRC with the Middle East Forum so -- can you be      7 more specific?      8 Q. Can you please compare your job with      9 the JCRC with your position at the Middle East Forum?      10 A. Yeah, so first I would have to tell you      11 what my job with the JCRC was. Is that fair?      12 Q. Go ahead. Yeah.      13 A. Okay. So with the JCRC we had      14 responsibility for about 18 to 19 different domestic      15 policy issues that were affecting the Jewish      16 community of western Pennsylvania, specifically      17 Allegheny County, Butler County, Beaver County,      18 Ligonier County, all the way up to Erie, up and down,      19 for population of about 48,000 Jews in western PA,      20 but, beyond that, it was about both building      21 harmonious relationships within the Jewish community      22 and beyond the Jewish community, so if you're talking      23 about tax relief, nonprofit relief, if you're talking      24 about assistance to the elderly, neighborhood      25 inclusion zones, OBIDs, opportunity for business</p>
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<p>1 diversity inclusion effort in Pittsburgh; and then      2 Vibrant Pittsburgh, which was meant for leveling the      3 playing field for minorities in the city and an area      4 called the Power of 32, which was the -- today you      5 would call it an economic opportunity zone, but it      6 was western Maryland, West Virginia, eastern Ohio,      7 and all of western Pennsylvania -- it's like west of      8 Altoona would be the area.</p> <p>9 Q. What was your position at the Jewish      10 Federation of Greater Pittsburgh?</p> <p>11 A. Well, the title was director of the      12 Jewish Community Relations Council, director of the      13 JCRC, but I had about nine other titles that was sort      14 of like part of that title at the position.</p> <p>15 Q. What was the work you did as director      16 of the JCRC similar to the work you're doing with the      17 Middle East Forum?</p> <p>18 A. Can you rephrase the question? I      19 didn't get it.</p> <p>20 Q. I guess I'm -- the title director of      21 the JCRC is -- you were the director of the JCRC,      22 today I believe you're the director of the Middle      23 East Forum; is that correct?</p> <p>24 A. Yes; however, two totally different      25 jobs with totally different responsibilities on two</p>	<p>1 improvement districts, education, anything that      2 touched the Jewish community as part of a public      3 policy interest both domestic within the Jewish      4 community around the city of Pittsburgh and beyond      5 the city of Pittsburgh; for instance, representation      6 in Harrisburg, representation in Washington D.C.,      7 even international issues, antisemitism in Europe and      8 even going to Israel. We had about like three or      9 four times a year that we found ourselves in Israel      10 because of local Jewish community interests in      11 Pittsburgh that then sort of intersected with the      12 sister city of Karmiel Misgav, that's K-a-r-m-i-e-l      13 M-i-s-g-a-v, in the north -- I guess northeast of      14 Israel between like the Sea of Galilee and the Golan      15 Heights, and the main responsibility there was sort      16 of like an interface between the volunteers of the      17 community and the interests of the federated Jewish      18 community, one being the laymen and the other being      19 the professionals. So that was the second element of      20 this. You had all the public policy interest but      21 then you have the interest of all the groups. So we      22 were involved with the NAACP, with the urban league,      23 with the mainline protestant community, with the      24 Anglican church, with the city of Pittsburgh      25 including Mayor Bill Peduto, County Executive Rich</p>

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1 Fitzgerald. You know, going beyond that, different  
 2 congressmen, Senator Toomey and Senator Casey,  
 3 Governor Wolf and before that Governor Corbett. So  
 4 every day was really a different public policy  
 5 challenge. Now, beyond that we also had to make sure  
 6 that we did Jewish community policy, so, you know,  
 7 you would go to the mayor and he's saying, hey, what  
 8 does the Jewish community think about policy X. So  
 9 we did reproductive health, we did civic inclusion,  
 10 did what you might call affirmative action, we were  
 11 involved with racial disparities, equality, the  
 12 necessity for social justice depending on the way you  
 13 look at it, but it could also be something like  
 14 vaccines or whatever. You know? If there was a  
 15 question to that, you would have to do it. But  
 16 beyond telling the mayor about that, you also had the  
 17 media relationships. So Pittsburgh Post-Gazette,  
 18 Pittsburgh Tribune, anything dealing with national  
 19 media and -- so there is also, like, Jewish segmented  
 20 media, so you have the Jewish Telegraphic Agency, you  
 21 have the Jewish Exponent, you know, in Philadelphia  
 22 but also the Pittsburgh Jewish Chronicle. So  
 23 anything that dealt with Jewish community interests  
 24 in short is what was the job responsibilities for the  
 25 JCRC, but it was sort of just all within the section

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1 of public affairs. Now, there was a management  
 2 responsibility insofar as it dealt with community  
 3 building and building capacity of external  
 4 organizations, so there was --

Q. How many people did you manage?

A. One, internally.

Q. That was like one direct report, is  
 that how you called it?

A. I would say it wasn't -- it was like a  
 10 third of a direct report I guess because it was an  
 11 individual who was shared across different -- it was  
 12 certainly not like what I had had in the army where I  
 13 had about like 30 direct reports.

Q. How many people were employed at the  
 15 Jewish Community Center?

A. Well, it's not the Jewish Community  
 17 Center. I don't know.

Q. Sorry.

A. It's the Jewish Federation.

Q. Yeah, the JCRC. Sorry about that.

A. No one was employed at the JCRC.

Q. The Jewish Federation of Greater  
 23 Pittsburgh --

A. That's not the JCRC.

Q. Sorry about that. When you were the

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1 director at the Jewish Federation of Greater  
 2 Pittsburgh, how many people worked there --  
 3 A. I was never the director at the Jewish  
 4 Federation of Greater Pittsburgh.

5 Q. Okay. Tell me what your job is at the  
 6 Middle East -- well, let me -- I guess let me set it  
 7 up first. When did you first start working at the  
 8 Middle East Forum?

9 A. I think August of 2015 or September of  
 10 2015.

11 Q. And when you first were hired with the  
 12 Middle East Forum what was your first position?

13 A. I guess the title was director. Well,  
 14 it was kind of a codirectorship, so director and  
 15 director.

16 Q. Was there another director who was  
 17 there at the time?

18 A. Yes.

19 Q. Who was that?

20 A. Amy Shargel.

21 Q. Shargel?

22 A. Yeah.

23 Q. Can you spell it?

24 A. S-h-a-r-g-e-l or j-e-l. It was like  
 25 five years ago.

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1 Q. At some point in time did Amy Shargel  
 2 leave the Middle East Forum and then you became the  
 3 director, is that how it happened?

4 A. Well -- no, it's a little bit more  
 5 complicated than that.

6 Q. You can explain it if you want.

7 A. Okay. So she retired but the job  
 8 responsibilities that Amy Shargel were not the same  
 9 job responsibilities that I had. So when you talk  
 10 about director, it's just a name. Okay? It's not a,  
 11 you know, one director does this, one director does  
 12 that; there has been multiple directors of MEF.

13 Q. Is it fair to say it's the name of the  
 14 position that is the second highest in the corporate  
 15 structure?

16 A. No, I don't think that's fair.

17 Q. Well, what would -- in a corporate  
 18 structure, in a hierarchy, Daniel Pipes has the  
 19 highest position; is that right?

20 A. No, he doesn't.

21 Q. Who has the highest position?

22 A. Steve Levy, the chairman of the  
 23 organization.

24 Q. And then work down from there and kind  
 25 of explain that hierarchy for me, please.

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1	A. Well, it's not a hierarchy, you know,	1	Q. So which board were you talking about
2	you're -- you're giving me a factual predicate that	2	when you said he's a member of the board?
3	doesn't exist, so I can't really answer the question.	3	A. I'm not sure. He's I think member of
4	Q. Okay. Well, underneath Steve Levy, if	4	the -- well, there is the board, there is the board
5	he's the chairman, who would be like the next person	5	of governors, okay, but the board of governors is a
6	who would be responsible for, like, policy at the	6	board that also exists in addition to the founders
7	Middle East Forum?	7	board, and both boards don't have any executive
8	A. Everyone is responsible for policy at	8	authority but he's still a member of them.
9	the Middle East Forum.	9	Q. What is the board of governors, what is
10	Q. Interns are responsible for policy?	10	that?
11	A. Well, it depends what you mean by	11	A. It's a group of donors who give a
12	everyone.	12	minimum amount to the organization and is updated
13	Q. I guess --	13	every once in a while with Middle East Forum news.
14	A. And what policy you're talking about.	14	Q. In order to be a member of the board of
15	Q. For creating Middle East Forum	15	governors do you have to donate a certain amount of
16	policies.	16	money?
17	A. It depends on what you mean by Middle	17	A. No.
18	East Forum policy. I can't answer the question if	18	Q. Like, is the -- what is the minimum
19	you're not specific.	19	amount that you said that someone has to donate to be
20	Q. All right. Let me try to be more	20	on the board of governors?
21	specific. So if Steve Levy is the chairman, what	21	A. I said they may donate a minimum
22	would Daniel Pipes' position be?	22	amount, but they may not as well.
23	A. Well, Daniel Pipes's position isn't	23	Q. What is that amount?
24	predicated on Steve Levy's position.	24	A. Well, depends on the individual.
25	Q. What is his position?	25	Q. Well, for instance, like, if I wanted
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1	A. Daniel's position -- Daniel actually	1	to be on the board of governors, could I donate a
2	has multiple positions, so you have to be specific of	2	certain amount of money and then I would be on the
3	what position you're asking about.	3	board of governors?
4	Q. Well, what are they? What are the	4	A. No.
5	multiple positions?	5	Q. Is there like an -- like, you know,
6	A. Of Daniel Pipes?	6	hey, if -- anyone who donates 20,000 we'll give them
7	Q. Yes.	7	the title of board of governors, does it work like
8	A. He's the publisher of the Middle East	8	that?
9	Quarterly. He is the editor-in-chief of the	9	A. No.
10	organization. He sits on multiple boards outside of	10	Q. Okay. How does it work? How does one
11	the Middle East Forum that sort of act as the liaison	11	become a member of the board of governors?
12	position he has. He is the -- I guess the titular	12	A. Each individual has a unique path that
13	name is president of the Middle East Forum, but he	13	they take to get to the board of governors.
14	has sort of like -- again, it fluctuates. He's the	14	Q. Okay. And -- since we got into that,
15	president but then he's also a member of the board,	15	let's just -- let me do it like this. Is there a
16	he's also a member of the executive committee, and	16	difference between -- strike that.
17	there's different people who have different	17	What are the officers -- on the website
18	intersecting roles within MEF. So, you know, he	18	there is a list of officers, and I'll represent to
19	might have a few more positions and titles that I	19	you it says president, Daniel Pipes; chairman, Steve
20	don't remember.	20	Levy; vice chairman, Joshua Katzen; treasurer,
21	Q. Fair enough. What is the board?	21	Lawrence Hollin; secretary, Gregg Roman. What is
22	A. Which board?	22	that?
23	Q. You said he's also a member of the	23	A. They're the officers on the website.
24	board. What --	24	Q. But what is that -- what is the
25	A. Well, there is multiple boards.	25	importance of being an officer? What is the

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1	relevance of that? What does it mean to be an	1	after November of 2018.
2	officer?	2	Q. But when did you -- when did you become
3	A. Well, they're listed on the website, so	3	the secretary?
4	that's the importance of it, that it's important	4	A. I became the secretary in -- I don't
5	enough for us to put it on the website.	5	recall. I would have to check the records.
6	Q. But do they have any other roles other	6	Q. Can you estimate? Was it in 2018?
7	than being listed on the website? Is there any,	7	2017?
8	like, responsibilities that come with those	8	A. No.
9	positions?	9	Q. It wasn't in 2017?
10	A. Could you be more specific? There is	10	A. No.
11	no connection between --	11	Q. Was it in 2018?
12	Q. Sure.	12	A. No.
13	A. -- the website and their jobs or	13	Q. Was it in 2019?
14	anything else.	14	A. No.
15	Q. Well, I guess, for instance, it says	15	Q. Was it in 2020?
16	secretary, Gregg Roman. What does that mean that	16	A. No.
17	you're the secretary of the -- what does that mean	17	Q. So then that leaves 2016 and '15 then,
18	that you're the secretary?	18	right?
19	A. It's a honorific given by virtue of	19	A. Maybe '15 or '16.
20	being an officer of the organization.	20	Q. And how many times has there been a
21	Q. Do you have any responsibilities as the	21	meeting of the executive committee since 2016?
22	secretary?	22	A. From what I remember, probably
23	A. Yes.	23	annually.
24	Q. What are those responsibilities?	24	Q. And do you attend those annual
25	A. They are to keep the minutes from the	25	meetings?
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1	-- I guess you would call it the executive committee	1	A. Do I attend which annual meetings?
2	meeting, and to transmit that to the executive	2	Q. The annual meetings of the executive
3	committee.	3	committee.
4	Q. And do you, in fact, do those	4	A. Some I have and some I haven't.
5	responsibilities?	5	Q. Are they ever held more than once a
6	A. When?	6	year?
7	Q. At the executive committee meetings?	7	A. Depends on the year.
8	A. Can you be more specific? Because	8	Q. Well, has there ever been a year when
9	there is multiple meetings.	9	there's been more than one meeting of the executive
10	Q. Sure. When was the last executive	10	committee since you became --
11	committee meeting?	11	A. I can't --
12	A. When was the last executive committee	12	Q. -- secretary?
13	meeting for what?	13	A. Since I became secretary, yes.
14	Q. For anything. When is the last time	14	Q. Has there ever been a year since you
15	there was a meeting?	15	became secretary when there's been more than two
16	A. Well, the last time that there was a	16	meetings of the executive committee?
17	meeting I wouldn't remember because I wasn't the	17	A. Yes.
18	secretary. I can tell you this. I can represent to	18	Q. Has there ever been a year since you
19	you that the last meeting that I remember was in	19	became secretary when there's been more than three
20	March of 2018.	20	meetings?
21	Q. How long have you been secretary?	21	A. Yes.
22	A. Well, like I said, just like the	22	Q. What's -- I guess what's the most
23	position of director is just a name, secretary up	23	amount of meetings that you recall being in a single
24	until November 1st of 2018 was a position that had	24	year of the executive committee? Since --
25	certain authority and then that authority changed	25	A. I can't give you an accurate

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<p>1 representation because I don't remember.</p> <p>2 Q. Just to make it clear, if we're asking</p> <p>3 questions today about your position as secretary, all</p> <p>4 the questions will be relegated -- I'm not asking you</p> <p>5 to answer questions about times when you weren't on</p> <p>6 the executive committee, so it's all relegated to</p> <p>7 that time between 2015 and the present when you were</p> <p>8 the secretary. Okay?</p> <p>9 A. Well, no, because there is -- can I</p> <p>10 offer sort of a footnote here to what the reason why</p> <p>11 I'm not specific and not sure? Is that okay?</p> <p>12 Q. Uh-huh. Yeah.</p> <p>13 A. So the responsibilities that I had as</p> <p>14 secretary of the executive committee were of a</p> <p>15 certain amount from the time that I believe 2015 or</p> <p>16 '16, I don't want to say that I know a hundred</p> <p>17 percent, but to the best of my recollection in 2015,</p> <p>18 '16, is when I had that title added as one of my</p> <p>19 roles at MEF, and then that title in terms of the</p> <p>20 name may have been on documents, but the authority</p> <p>21 vested in that title was removed in I want to say</p> <p>22 November -- I'm not going to give the exact date, but</p> <p>23 the authority vested as a officer of the organization</p> <p>24 was removed and has not been returned since early</p> <p>25 November of 2018.</p>	<p>1 there a way to do that?</p> <p>2 A. Yeah, you -- I think the videographer</p> <p>3 did it before.</p> <p>4 THE VIDEO SPECIALIST: Do you have</p> <p>5 an option up on top of the screen where</p> <p>6 it gives you a set of names that you can</p> <p>7 share it with, and one of the names</p> <p>8 should be Mr. Roman.</p> <p>9 MR. CARSON: It says you are</p> <p>10 screen sharing, and when I hover over</p> <p>11 that it says participants?</p> <p>12 THE VIDEO SPECIALIST: Yeah,</p> <p>13 select one of the -- see if Mr. Roman is</p> <p>14 one of the participants.</p> <p>15 MR. CARSON: He is.</p> <p>16 THE VIDEO SPECIALIST: Okay.</p> <p>17 MR. CARSON: When I click on it,</p> <p>18 nothing happens, though.</p> <p>19 THE VIDEO SPECIALIST: Nothing</p> <p>20 happens when you click on his name?</p> <p>21 MR. CARSON: I hover over it, it</p> <p>22 says participants, 13 --</p> <p>23 THE VIDEO SPECIALIST: Yeah,</p> <p>24 Mr. Roman, see if you can take over the</p> <p>25 mouse.</p>
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<p>1 Q. Who removed that authority?</p> <p>2 A. Daniel Pipes.</p> <p>3 Q. How did he tell you that that authority</p> <p>4 was going to be removed?</p> <p>5 A. It was communicated to me in a letter I</p> <p>6 believe in November of 2018.</p> <p>7 Q. I'm going to show you an exhibit.</p> <p>8 A. Sure.</p> <p>9 Q. I might have that letter. Okay. So it</p> <p>10 will be 51 -- hold on. So -- let me just do a screen</p> <p>11 share. So I'm going to do a screen share and share a</p> <p>12 document that is -- so this document I'll represent</p> <p>13 to you is a document that was turned over, produced</p> <p>14 by your lawyers during the course of discovery, and</p> <p>15 your lawyers put Bates stamps on these documents, and</p> <p>16 you can see the document I'm producing, which we'll</p> <p>17 call it Roman 1, Roman Exhibit 1, will be the</p> <p>18 document that's Bates stamped 000049, 50, 51, and 52.</p> <p>19 And -- so this letter is dated November 6th, 2018,</p> <p>20 and just take a minute and look at it. If you want</p> <p>21 me to scroll down, let me know and I'll scroll down.</p> <p>22 A. Would you mind giving me the ability to</p> <p>23 scroll myself so I can read at my own time?</p> <p>24 Q. Yeah, I don't really know how to do</p> <p>25 that, but I don't have a problem doing that. Is</p>	<p>1 THE WITNESS: Here, I'm requesting</p> <p>2 remote control.</p> <p>3 THE VIDEO SPECIALIST: Yeah, see</p> <p>4 if you can take over.</p> <p>5 MR. CARSON: Oh, approve.</p> <p>6 THE WITNESS: I'm just</p> <p>7 representing to you, Mr. Carson, that I</p> <p>8 am reading this document. Is that okay?</p> <p>9 MR. CARSON: Okay. Yeah. Thank</p> <p>10 you. Take your time.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. My first question is, just when you're</p> <p>13 done, is this the letter you're talking about.</p> <p>14 A. Well, I'm not sure, because there is a</p> <p>15 note here that has a mistake. Effective November 5th</p> <p>16 your job description has chanted. And I don't</p> <p>17 remember ever having a offer like this with a</p> <p>18 spelling mistake. So I can't verify this is the</p> <p>19 document that I'm talking about.</p> <p>20 Q. Well, I'll represent to you this</p> <p>21 document came from you guys, so --</p> <p>22 A. That's fine that it came from us, but</p> <p>23 it doesn't have a log of the files, it doesn't have</p> <p>24 metadata associated with a file that may have been</p> <p>25 given to me.</p>

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1	Q. Well, did --	1	A. Yeah, I'm still the director today.
2	A. I would request -- I would request that	2	Q. And you kept your title when you
3	if there is such a document which is the changes of	3	received that letter in November of 2018?
4	my employment and we do have it on our system that	4	A. Well, title as in the name or title as
5	the counsel for MEF do provide this to Mr. Carson.	5	in the position?
6	Is that fair, Jon?	6	Q. Title as in the name. You kept -- you
7	(Simultaneous speakers.)	7	keep -- you keep the title of director is what I
8	BY MR. CARSON:	8	believe he said to you, do you remember that?
9	Q. Yeah, I mean do you remember receiving	9	A. Well, again, you're representing
10	a document like this around November 6th, 2018?	10	something that whether or not this is --
11	A. Well, there's receiving a document like	11	Q. I'm not asking you to confirm the
12	it and then there's receiving the document that I'm	12	document; I'm just asking you if you remember that he
13	talking about. So if you want me to be specific, and	13	-- you got to keep your title as director.
14	I would like to offer as much specificity as	14	A. Can the stenographer please read back
15	possible, I cannot say with a hundred percent	15	the question?
16	validity that this document is something -- this	16	Q. She doesn't have to read back the
17	document that you're representing to me as something	17	question. I'm not asking that question. I'm asking
18	that's been handed over by MEF's counsel is something	18	if you remember that you kept your title as
19	that I received.	19	director --
20	Q. So I'm just asking you do you remember	20	A. I kept the name director as it related
21	receiving a document like this, and by like this I	21	to the name but not the title. Title and name is two
22	just mean a document that you received from Daniel	22	different things.
23	Pipes around November 6th, 2018, where he changed	23	Q. Okay. I don't know -- what's the
24	your job responsibilities with the Middle East Forum.	24	difference between the title and the name in your
25	A. Again, "like this" is a comparable	25	mind?
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1	term. I did receive a document from Daniel Pipes in	1	A. Sure. So you could call me Mr. Roman,
2	November of 2018 which changed the terms of my	2	but Mr. Roman might represent Mr. Roman me or
3	employment. Whether or not it's this --	3	Mr. Roman being married, so if you want to say title
4	Q. And --	4	of director, as it's represented in that document, I
5	A. -- document, I cannot verify that this	5	would have to see the document, because I remember
6	is the specific document that I received.	6	there was -- there was a debate that took place over
7	Q. Well, let's kind of just go down the	7	what the exact title and responsibilities were to be
8	list and see what's -- see if there is anything you	8	associated with that word director itself.
9	remember different. So do you remember the document	9	Q. So you remember you kept the name
10	that you received you kept your title as director?	10	director; is that what your testimony --
11	A. Again, you're asking me to remember a	11	A. Yes, if you say director -- like, my --
12	document that I don't know whether or not it's in	12	in my signature block, Gregg Roman, director, Middle
13	front of me, so if you would like --	13	East Forum, that was in the signature block of
14	Q. I'm asking you if you kept --	14	e-mails, yes, that's a fair representation.
15	A. -- if you would like to ask me about	15	Q. It never changed.
16	that document, the specific document, of my change of	16	A. To the best of my knowledge the name in
17	employment -- and I believe I had to sign it, so if	17	my signature block never changed.
18	that exists, then that's something that I'm sure that	18	Q. You were the director before November
19	we can refer to you, but --	19	of 2018 and you've been the director since November
20	Q. Did -- do you --	20	of 2018, correct?
21	A. -- in -- if you'll just --	21	A. What do you mean director? Because,
22	Q. Mr. Roman, I'm just asking if you	22	like I said beforehand, the job director has changed
23	remember if you kept your title.	23	at multiple times as I've been at MEF -- the name
24	A. If I kept my title of what?	24	stayed the same but the responsibilities changed.
25	Q. Director.	25	Q. Okay. So we're -- I guess let's talk

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1	about the name then. You were named director before	1	November of 2018?
2	November 2018 and you've been named director since	2	A. Not in totality, no.
3	November 2018; is that fair to say?	3	Q. To some degree you did?
4	A. The name, the position name director,	4	A. To some degree that's fair to say.
5	has remained the same since I've been hired, yes,	5	Q. Did you do fundraising, in meetings, on
6	that's correct.	6	the telephone, and in writing after November 2018?
7	Q. Do you remember that your	7	A. Yes.
8	responsibilities were -- so if we read the	8	Q. Did you do media appearances on
9	responsibilities section, you will have the following	9	Forum-related topics?
10	responsibilities, managing the Forum's external	10	A. When?
11	projects and initiatives, including all the directors	11	Q. After November of 2018. And we're
12	of the Forum's projects except the Middle East	12	talking about when your job responsibilities changed,
13	Quarterly editor; fundraising, in meetings, on the	13	right? So did you continue to do media appearances
14	telephone, and in writing; making media appearances	14	on Forum-related topics?
15	on Forum-related topics. Does that sound like a good	15	A. Yes and no.
16	description of your responsibilities pursuant to when	16	Q. Are these restrictions accurate after
17	you received the letter, whether it was this letter	17	your position -- after you received the letter --
18	or another letter, in November 2018?	18	strike that.
19	A. No.	19	Did your -- after you received the
20	Q. What's different about this list versus	20	letter in November of 2018 -- and can we -- can we
21	what you did?	21	just kind of pin down the date? Is it fair to say
22	A. Well, this list has responsibilities	22	you received that letter at the beginning of November
23	that were inclusive but not wholly inclusive, so it	23	2018, if you don't know the exact date?
24	might say that I was supposed to do these things, but	24	A. Again, I don't know this specific
25	there were other responsibilities that were added	25	letter that you're showing me is something that I --
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1	that I didn't have prior to November of 2018.	1	Q. No, we've established that.
2	Q. So I think what you're saying, correct	2	A. -- received. Yeah.
3	me if I'm wrong, is you did these three things but	3	Q. We're not -- so I'm not trying to make
4	there is other things you did as well.	4	you say that -- I'm not trying to trick you. I'm
5	A. No, that's not what I'm saying.	5	just trying to ask you if the letter you received
6	Q. Okay. Correct me, please.	6	was, say, between November 1st and November 10th,
7	A. Correct you about the inclusive	7	2018.
8	responsibilities listed in this document or direct	8	A. I don't know. I would have to see the
9	you --	9	letter.
10	Q. Take it line by line. So managing the	10	Q. Do you remember it being -- do you
11	Forum's external projects and initiatives, including	11	remember whether there was a meeting around November
12	all the directors of the Forum's formal projects	12	5th, 2018?
13	except the Middle East Quarterly editor, that's --	13	A. Can you be more specific?
14	A. Right.	14	Q. Yeah.
15	Q. -- bullet point 1. Did you keep that	15	A. Your question was was there a meeting
16	responsibility after November of 2018?	16	around November 5th of 2018. I've been in a lot of
17	A. The specific managing the Forum's	17	meetings, Mr. Carson. I'm not sure what you're
18	external projects and initiatives, including all the	18	referring to.
19	directors of the Forum's formal projects except the	19	Q. Yeah. I guess you can interpret the
20	Middle East Quarterly editor, we would have to go	20	question to mean was there a meeting anywhere on the
21	project by project to tell you about what the	21	planet Earth in November, so let me be more specific.
22	responsibilities were prior to twenty -- November of	22	So around November 5th, 2018, it's my
23	2018 and then after, because that did change.	23	understanding that there was a meeting held at the
24	Q. Well, did you continue to manage the	24	Middle East Forum where the people who worked in the
25	Forum's external projects and initiatives after	25	Philadelphia office all attended. Do you recall

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1	that?	1	where he was told not to go. It relates 2 to the investigation. You guys are 3 clearly going to make a Faragher-Ellerth 4 argument in this case where you're going 5 to talk about the investigation, you're 6 going to talk about the meeting, so it's 7 not privileged. 8
2	A. I wasn't at any meeting.	9	MR. GOLD: My directive stands, so 10 you're free to do as you please.
3	Q. But do you recall that that meeting was	11	MR. CARSON: Okay.
4	held?	12	THE WITNESS: Mr. Carson --
5	A. Do I recall that a meeting was held on	13	BY MR. CARSON:
6	November 5th of 2018 of the Forum staff in	14	Q. Why didn't --
7	Philadelphia that did not involve me? Yes, I	15	A. Can I just ask you a question for a
8	remember hearing that there was a meeting that was	16	second? Are you okay if I get up and I adjust the
9	supposed to take place, and I can't tell you whether	17	window?
10	it took place because I wasn't there, but I heard	18	Q. Yeah.
11	that there was a meeting that took place on November	19	A. Okay.
12	5th, 2018, of the Forum staff in Philadelphia, but,	20	Q. Yeah. You don't have to ask me that.
13	again, wasn't there, so I can't tell you what	21	A. I don't want to, like, ruin the
14	happened.	22	stenographic record or whatever the video thing.
15	Q. And who told you about that meeting?	23	THE VIDEO SPECIALIST: We're off
16	A. Well, multiple people told me about	24	the record.
17	that meeting.	25	THE WITNESS: Back on. Sorry
18	Q. Who was the first person to tell you		about that.
19	about it?		
20	A. I don't remember.		
21	Q. Was Daniel Pipes one of the people who		
22	told you about it?		
23	A. About the meeting that took place on		
24	November 5th, 2018?		
25	Q. Correct.		
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1	A. I actually don't remember if Daniel	1	MR. CARSON: Take a break any time
2	told me about it. I do remember that there was a	2	you need to today.
3	memo that went out and then -- that memo said a	3	THE WITNESS: I'm good, I just
4	meeting was going to be held, and then I was	4	wanted to -- got this light thing going
5	specifically told not to attend.	5	on here, so I don't want to mess up the
6	Q. Who told you not to attend?	6	video for you guys.
7	A. That information is privileged.	7	BY MR. CARSON:
8	Q. It's not -- even if Marc Fink told you	8	Q. Why didn't you attend the meeting
9	not to attend it's not privileged.	9	pursuant to the memo on March 5th, 2018?
10	A. I'll rely on advice of counsel whether	10	A. That information is privileged.
11	I can answer that question or not.	11	Q. Were you told not to?
12	MR. GOLD: Direct you not to	12	A. What did you say?
13	answer the question.	13	Q. Were you told not to?
14	MR. CARSON: Not privileged,	14	A. I believe that my answer on the record
15	Mr. Gold.	15	stands.
16	MR. GOLD: Take it to the Court.	16	Q. Were you invited to the meeting
17	MR. CARSON: I mean, we can call	17	originally?
18	if you really want me to.	18	MR. GOLD: Asked and answered.
19	MR. GOLD: Go ahead. Feel free to	19	THE WITNESS: I believe my answer
20	do so.	20	stands.
21	MR. CARSON: I mean, we have other	21	BY MR. CARSON:
22	issues to talk to the Court about anyway	22	Q. You can answer again. Asked and
23	today, but it's not privileged if Marc	23	answered isn't an instruction not to answer the
24	Fink told him. You guys included me on	24	question.
25	all the e-mails that Marc Fink was on	25	A. But I'm saying I believe that my answer

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1	on the record stands.	1	Q. What was the meeting about?
2	Q. We're not going to make the court	2	A. I don't know, Mr. Carson.
3	reporter read stuff back all day, so just answer	3	Q. You have no idea what that meeting was
4	again, please. Were you originally invited --	4	about.
5	MR. GOLD: Mr. Carson, I direct	5	A. Mr. Carson, I can't --
6	him not to answer. It's been asked and	6	Q. You understand you're under oath.
7	answered.	7	A. Mr. Carson, I can't -- I can't tell you
8	MR. CARSON: I'm going to call the	8	about a meeting that I did not attend.
9	Court.	9	Q. But you understand you're under oath
10	MR. GOLD: Go ahead.	10	today, right? So if you know what the meeting is
11	MR. CARSON: Give me a second.	11	about and you say you don't know, that's a lie and
12	THE VIDEO SPECIALIST: We are off	12	that's perjury; you do get that, right?
13	the record --	13	A. Mr. Carson --
14	MR. CARSON: Could we go off the	14	MR. GOLD: Mr. Carson, please save
15	record, too?	15	your accusations when you get in front
16	THE VIDEO SPECIALIST: We're off	16	of a jury. I'm not going to allow you
17	the record. It's 12:21 p.m. Eastern.	17	to harass the witness or try to
18	(A discussion was held off the record.)	18	embarrass the witness. Just rephrase
19	MR. GOLD: You know what, in order	19	the question, let's move along.
20	to save time, just answer the question,	20	MR. CARSON: No.
21	Mr. Roman. Were you invited to the	21	BY MR. CARSON:
22	meeting originally?	22	Q. You do understand what perjury is,
23	THE WITNESS: I believe that I	23	right?
24	said on the record --	24	A. Mr. Carson, I am aware what perjury is,
25	MR. CARSON: We're not on -- are	25	yes.
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1	we on the record right now?	1	Q. Okay. So if you know something and you
2	MR. GOLD: Yeah, back on the	2	deny knowledge to it, that's perjury. You understand
3	record. I'm going to allow him to	3	that, right?
4	answer that question whether he was	4	A. Mr. Carson, I would appreciate it if
5	originally invited to the meeting.	5	the stenographer can read back the question that
6	THE WITNESS: I'll repeat what I	6	you're asking me to reference in terms of whether I
7	said beforehand. I received a memo that	7	know what perjury is or is not.
8	there was going to be a meeting on	8	Q. She -- my question to you is, if you
9	November 5th, 2018, in the	9	deny having knowledge of something that you have
10	Philadelphia's office.	10	knowledge of, you understand that that's perjury,
11	BY MR. CARSON:	11	right?
12	Q. Did that memo instruct you to be at the	12	A. Yes, Mr. Carson.
13	meeting?	13	Q. Okay. So with that understanding, do
14	A. I did not construe that memo as an	14	you have any idea what the November 5th, 2018,
15	invitation; however, if you have a copy of the memo I	15	meeting was about?
16	would be happy to look at it and give you my	16	A. Mr. Carson, again, if you're asking
17	interpretation of it.	17	me --
18	Q. Have you ever read the memo since then?	18	Q. Yes or no --
19	A. No, I have not.	19	A. No, it's not a yes or no question
20	THE COURT REPORTER: I didn't hear	20	because there is an explanation here that has to --
21	that question, Mr. Carson. What was it?	21	Q. No, actually it is.
22	BY MR. CARSON:	22	A. No, there's not, Mr. Carson.
23	Q. Have you ever read the memo since that	23	Q. If you know what the meeting was about.
24	meeting?	24	A. If you'll please allow me to answer, I
25	A. No, I don't remember.	25	would be happy to.

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1	Q. I'll allow you to say whatever you	1	meeting was about.
2	want, but begin your answer by saying whether you	2	A. Again to say that if I was at the
3	knew what the meeting was about, yes or no.	3	meeting or if I wasn't at the meeting, my general
4	A. Mr. Carson, I am aware that a memo went	4	understanding of what took place is is that there
5	out prior to November 5th, 2018, that described a	5	were accusations that were made against me by members
6	situation at the Middle East Forum, and to get to	6	of MEF staff and those accusations were discussed
7	that specific situation we would have to see the memo	7	with MEF staff. That's the general character of what
8	right now, and then that meeting was one that I did	8	I understood took place at the meeting.
9	not attend, so if you're asking me that if I know	9	Q. What's your understanding of what those
10	exactly what happened at that meeting, I cannot give	10	accusations were?
11	you an honest answer because I wasn't there.	11	A. Whose accusations?
12	Q. That wasn't my question. Do you know	12	Q. The ones made at the meeting.
13	generally what that meeting was about?	13	A. Well, it depends because from what I
14	A. Well, generally --	14	understand there were many accusations, so if you
15	Q. Sitting here today.	15	want to ask me about a specific accusation, I can
16	A. Sitting here today I know that I have	16	give you my opinion.
17	reviewed a two and a half page document which was	17	Q. No, I'm asking you generally what
18	minutes and notes from that meeting, so if you're	18	accusations do you recall there being.
19	asking me about the minutes as they represented what	19	A. Generally there was discontent with my
20	happened at that meeting, I can comment on that if	20	management style and that's what was broached at the
21	you'll show me them, but if you're asking me what	21	meeting.
22	happened at the meeting, I was not there.	22	Q. Was those accusations limited to
23	Q. So I'm -- it's a very simple question.	23	discontent of your management style?
24	Do you know generally what the meeting was about?	24	A. You would have to ask the people at the
25	A. No, Mr. --	25	meeting regarding the specifics, but based on the
1	MR. GOLD: Mr. Carson, he just	1	memo that I saw, there was a wide range of issues
2	answered that he had read the minutes	2	that were brought up regarding the general topic of
3	and he now knows what the meeting was	3	discontent with my management style at that meeting,
4	about.	4	but, again, Mr. Carson, I wasn't there so I can't
5	BY MR. CARSON:	5	tell you.
6	Q. He now knows.	6	Q. Well, did anyone ever talk to you about
7	A. I would like to correct that record of	7	the meeting afterwards?
8	your representation what you're saying I now know and	8	A. That is privileged information.
9	also Mr. Gold's representation. I am aware -- I am	9	Q. It's only privileged if it comes from
10	aware --	10	your lawyer.
11	Q. Either you know or you don't.	11	A. The only discussions I've had regarding
12	A. No, it's not yes or no, it's not black	12	that meeting has been with counsel.
13	and white, it's not a binary question.	13	Q. Daniel Pipes never talked to you about
14	Q. Okay.	14	that meeting?
15	A. I know that there are minutes of a	15	A. Again, the only discussion that I've
16	meeting that took place on November 5th, 2018, that I	16	had has been in the presence of counsel.
17	have reviewed and I know what's in those minutes.	17	Q. So Daniel Pipes -- well, I'm asking you
18	That is what I'm representing to you.	18	what Daniel Pipes said to you, not what your counsel
19	Q. What was it about? What was the	19	said to you.
20	meeting about?	20	A. About what?
21	A. In those minutes that are raised I	21	Q. Did Daniel Pipes -- did Daniel Pipes
22	would be happy to review them and comment on that	22	ever talk to you about that meeting?
23	document, but it's not in front of me right now.	23	A. Daniel Pipes spoke to me about his
24	Q. I'm not putting it in front of you.	24	general discontent with my management style, but he
25	I'm asking you what your knowledge is about what the	25	never broached to me, beyond anything that was

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1	written in a formal document that you may have in	1	Mr. Carson, and, again, I'm asking you please be
2	your possession, what it was that was specifically	2	specific.
3	brought up at that meeting.	3	Q. And I'm responding to your request by
4	Q. Daniel Pipes spoke to you generally	4	telling you that I am being specific in asking you
5	about his discontent in your management style? Is	5	what he's talked to you about pursuant to that
6	that what --	6	meeting. So I can back up and set up the question.
7	A. Oh, yeah. He really laid into me.	7	There was a meeting on November 5th,
8	Q. What did he say about discontent in	8	2018, and your testimony is that that meeting was
9	your management style?	9	about your management style, correct?
10	A. Well, depends on what topic you're	10	A. That's what I believe the meeting was
11	talking about, finances, we're talking about travel,	11	about. I'm not testifying that it was about that.
12	or we're talking about policy, or talking about	12	I'm testifying to you that I saw a memo that went out
13	personnel matters. Please be more specific.	13	that described the results of that meeting and what
14	Q. No, I'm not going to be more specific.	14	was allegedly discussed that, but, again, I wasn't
15	I'm saying generally what did Daniel Pipes tell you	15	there, I can't comment on something that I wasn't at.
16	what his discontent in your management style. If you	16	I can comment about what I heard. I can comment
17	want to begin in a certain area, you're welcome to do	17	about what I heard. I can comment about what was
18	that, Mr. Roman.	18	conveyed to me. But I cannot tell you what happened
19	A. Yeah, well, he generally was not happy	19	at that meeting.
20	with my management style. That's the general answer.	20	Q. Well, you read the minutes of the
21	Q. Did he say anything else besides I'm	21	meeting, correct?
22	not happy with your management style?	22	A. Yes, I did.
23	A. There was many things that he said.	23	Q. Okay. So based on everything you know
24	Q. What were those things?	24	about the meeting, reading the --
25	A. Well, I've had -- I must have had	25	A. Okay.
	Page 53		Page 55
1	dozens of conversations, hundreds, thousands of	1	Q. -- reading the minutes, people talking
2	conversations with Daniel since I started working at	2	to you about it, everything that you've ever heard
3	the Middle East Forum, so, again, if you're asking	3	about that meeting on November 5th, 2018, that --
4	about a specific conversation on a specific day, I	4	A. Sure.
5	would be happy to answer it, but you got to give me	5	Q. -- occurred at the Philadelphia --
6	more specificity, Mr. Carson.	6	based on that, my question is did Daniel Pipes ever
7	Q. I'm talking to you about the --	7	talk to you about that?
8	Mr. Pipes -- is it your testimony that Mr. Pipes	8	A. Daniel Pipes discussed with me the
9	spoke to you after the November 5th, 2018, meeting	9	issues of my management style that were brought up at
10	about the November 5th, 2018, meeting?	10	that meeting, yes, he did.
11	A. Has he spoken to me about the meeting?	11	Q. When did he do that?
12	I knew that there was a meeting taking place, but	12	A. I don't remember.
13	counsel informed me of that meeting, not Mr. Pipes.	13	Q. Was it -- it was obviously after the
14	Q. Did Mr. Pipes ever speak to you about	14	meeting, correct?
15	that meeting?	15	A. We've had many discussions about my
16	A. Mr. Pipes I think was in a conversation	16	management style that took place after that meeting.
17	with counsel that I was present at but I've been	17	In fact, we probably discussed an issue with my
18	instructed to not discuss the contents of that	18	management style only a few weeks ago. He is my
19	conversation that took place with counsel, it's	19	direct -- he is my direct supervisor. He talks about
20	legally privileged.	20	my management style all the time.
21	Q. So I'm asking you if -- what Mr. Pipes	21	Q. Well, what -- okay. So -- I mean, we
22	said to you. I'm not asking you what any lawyer said	22	can get to the one that you had a couple weeks ago.
23	to you. Anything that Mr. Pipes said to you is not	23	A. Sure.
24	privileged.	24	Q. But let's talk about the meeting first.
25	A. Mr. Pipes has said many things to me,	25	So when was the first time he came to you after the

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<p>1 meeting to talk to you about what happened at the 2 meeting?</p> <p>3 A. I believe that he conveyed a letter to 4 me of the results of that meeting. There was no 5 formal conversation or informal conversation that 6 took place as a result. He had told me that -- he 7 had told me in this letter that he had communicated 8 to me that there had been an investigation, that he 9 had determined what would be the future of my role in 10 the organization, and as a result of the future of 11 that role in the organization my job was to change. 12 So that's sort of the --</p> <p>13 Q. Other than --</p> <p>14 A. -- that's sort of the milieu of the 15 progression of events that took place.</p> <p>16 Q. Other than that letter, was there any 17 other communications to you about what happened at 18 that meeting?</p> <p>19 A. There was not any further 20 communications beyond the letter that I received. 21 There were communications subsequent to this letter 22 which came up which further took away other 23 responsibilities that I had had at the Middle East 24 Forum. There was actually -- there must have been 25 six -- six or seven communications after November 6th</p>	<p>1 place both prior to my arrival to the organization 2 and after my arrival to the organization that take 3 place regarding any sort of formal complaint filed 4 against a staff member, and those --</p> <p>5 Q. Well, we're going to --</p> <p>6 A. -- those procedures --</p> <p>7 Q. We're going to deal with --</p> <p>8 A. I'm trying to provide some context for 9 the answer -- I can stop if you want me to.</p> <p>10 Q. Go ahead, finish. No, no, finish what 11 you're saying.</p> <p>12 A. Those procedures regarding complaints 13 are what the management staff of the organization 14 followed after, I think, both before, during, and 15 after, the November 5th, 2018, meeting that took 16 place that I saw the minutes of. So if you're asking 17 about six or seven different communications, there is 18 two ways we can do it. We can either show each 19 communication or I can recall to the best of my 20 recollection what took place, but I would like to be 21 able to reserve the right to offer a more specific 22 answer if you do ever produce something of a document 23 that I would be able to count on to correct the 24 record. Is that fair?</p> <p>25 Q. Yes, so that's fair, but before -- so</p>
<p>1 of 2018 which either added new responsibilities or 2 removed responsibilities or benefits or renumeration 3 or pay. So this is not -- this letter that I 4 described previously, or the memo, contract, whatever 5 you want to call it, was not the be all end all of 6 the entire results of what happened on November 5th. 7 There was many many more things that happened after 8 that. That's why I'm trying to ask you to provide 9 specifics, because I want to be able to answer the 10 question in the most accurate truthful way possible, 11 Mr. Carson.</p> <p>12 Q. We're going to get there. So the --</p> <p>13 A. I'm trying to help you.</p> <p>14 Q. -- the six or seven communications that 15 you testified to just now that occurred after the 16 November 5th, 2018, meeting, all those communications 17 were electronic communications?</p> <p>18 A. Yes, we have never discussed any issues 19 that were of a nonlegal nature as they related to the 20 series of events of November 5th in a venue that did 21 not have the presence of counsel, and, more than 22 that, any allegation that was ever communicated to me 23 which had a formal legal conclusion were protected by 24 privilege. There is procedures in place, Mr. Carson, 25 at the Middle East Forum that have always been in</p>	<p>1 before we get into looking at --</p> <p>2 A. Sure.</p> <p>3 Q. -- documents, I just want to -- I want 4 to isolate what we're talking about, so --</p> <p>5 A. Sure.</p> <p>6 Q. -- there is -- you're talking about --</p> <p>7 what we're discussing right now all centers around 8 this November 5th, 2018, meeting; is that fair to 9 say?</p> <p>10 A. Well, I don't know if it's necessarily 11 fair to say because the November 5th, 2018, meeting 12 was a simulacrum of a bastion of different management 13 complaints, so --</p> <p>14 Q. A what?</p> <p>15 A. Okay. I'll try to rephrase that. The 16 --</p> <p>17 Q. Simulacrum?</p> <p>18 A. Yeah, simulacrum, s-i-m-u-l-a-c-u-r-m.</p> <p>19 Okay? It was a collection --</p> <p>20 Q. Okay.</p> <p>21 A. -- or a medium --</p> <p>22 Q. I'll look that one up when we're on a 23 break.</p> <p>24 A. All right. Whatever. It was a medium 25 of different complaints about my management style,</p>

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<p>1 and as a result of those complaints that I saw in      2 those memo -- that I saw in that memo, both counsel,      3 management, and the leadership of the organization      4 took steps to correct any alleged actions that were      5 raised at that meeting. I mean, this process was      6 exhaustive, and I think that the document record and      7 also the testimony that I give here today will      8 reflect the exhaustive steps that Mr. Pipes, that      9 counsel, and that others, including your clients,      10 took to try to deal with whatever was said at that      11 meeting that I wasn't present at. So I can comment      12 on what happened after, but I can't comment on what      13 took place there at the meeting.</p> <p>14 Q. Let's just slow down for a second. So      15 --</p> <p>16 A. Sure.</p> <p>17 Q. -- what we're talking about has to do      18 with the meeting and these allegations, you've      19 characterized them as allegations about your      20 management style, but that -- those things all      21 occurred at the beginning of November and they led up      22 to the November 5th, 2018, meetings; is that what you      23 recall?</p> <p>24 A. No, I don't recall that. There was      25 actually other times that Mr. Pipes raised complaints</p>	<p>1 management issues.</p> <p>2 Q. Okay.</p> <p>3 A. And that's what filled the thing of the      4 -- the memo itself, if that's like a fair way      5 to categorize it.</p> <p>6 Q. If you want to characterize this --      7 sorry. If you want to characterize them as      8 complaints about management issues, I'm fine -- as      9 long as we're talking about the same thing, I don't      10 care what we call them today. So --</p> <p>11 A. What are you talking about, Mr. Carson.</p> <p>12 Q. We're talking about the allegations      13 that some of these employees made in connection with      14 you that led to the November 5th, 2018, meeting.      15 Okay? So just so we understand that we're talking      16 about the same thing.</p> <p>17 A. I think we're maybe talking about two      18 different things.</p> <p>19 Q. Okay. So I'm talking about allegations      20 that specifically three people made around November      21 1st, 2018, Patricia McNulty, Lisa Barbounis, and      22 Marnie Meyer, and those -- these allegations that      23 these three people made culminated in a meeting on      24 November 5th, 2018. Is that what you understand?</p> <p>25 A. That's part of what culminated in a</p>
<p>1 about my management style and took corrective action      2 against me prior.</p> <p>3 Q. We're not talking --</p> <p>4 A. No, but I'm saying -- like you're      5 asking me in total is November 5th about that, and      6 it's not. Okay? Mr. Pipes --</p> <p>7 Q. Okay.</p> <p>8 A. -- has what I would call a 360 degree      9 review process as it relates to the people that      10 report to him, and I'm not the only person that's a      11 direct report. There is people at the Middle East      12 Forum that do not report to me. Okay? Still to this      13 day --</p> <p>14 Q. So --</p> <p>15 A. -- and even before November 5th there      16 was never a time where all individual staff members      17 at MEF reported to me. It is a complex organization.</p> <p>18 Q. I understand. But the meeting that was      19 in November 5th, 2018, was because certain people      20 made these -- made some allegations against you; is      21 that what you understand?</p> <p>22 A. That's what I understand, yes, that      23 they made allegations that included -- I estimate --      24 if you look at the notes, this is just based on my      25 memory of it, about 90 percent had to do with</p>	<p>1 meeting on November 5th, 2018. There were other      2 issues that also from what I understand led to that      3 meeting taking place.</p> <p>4 Q. What are those issues? Can you just      5 name them like one at a time, just --</p> <p>6 A. I'll try to recall to the best of my      7 ability other things that may have led towards that.</p> <p>8 Q. Okay.</p> <p>9 A. There was a --</p> <p>10 Q. Give me --</p> <p>11 A. Yeah, I'll go through them as best as I      12 remember. Okay?</p> <p>13 Q. Just because this way we can talk about      14 it and --</p> <p>15 A. Yeah, yeah, fine, fine, and then if you      16 can just kind of like signpost. Okay? I understand      17 that anything -- notes that I write in this will be      18 made available to you because it's -- we're now under      19 oath, but are you okay with me just sort of listing      20 these so I also keep track of that? Is that fair?</p> <p>21 Q. Let me list them and then you -- you      22 say them and I'll list them --</p> <p>23 A. Right, but I would rather have a record      24 I can also look at so that if I write something --      25 I'll give you the notes afterwards, I'm not going to</p>

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<p>1 refer to any documents that you don't have available 2 --</p> <p>3 Q. Well, just give me the -- just give me 4 the first one first. Let's just -- just give me --</p> <p>5 A. Yeah.</p> <p>6 Q. Other than the women's allegations, 7 you're -- I think the list that you're trying -- that 8 you want to make is a list of other reasons why these 9 meetings happened other than these women's 10 allegations; is that right?</p> <p>11 A. Sure. Sure. So it goes beyond that 12 and I'm going to refer to the -- to what I remember 13 here as what I think may have been the other reasons.</p> <p>14 Q. All right. Just give me the first 15 thing.</p> <p>16 A. Sure. A complaint that Lisa Barbounis 17 filed against Marnie Meyer on October 30th, 2018.</p> <p>18 Q. Okay.</p> <p>19 A. The second thing --</p> <p>20 Q. Can you say that date again?</p> <p>21 A. A complaint that Lisa Barbounis filed 22 --</p> <p>23 Q. Filed against Marnie --</p> <p>24 A. -- against Marnie Meyer on October 25 30th, 2018.</p>	<p>1 website by a company called Jump and then GoldenComm. 2 Jump is a company in Kentucky; GoldenComm is a 3 company in California I want to say, Newport Beach or 4 Manhattan Beach.</p> <p>5 Q. Okay. So that's five.</p> <p>6 A. There was a complaint about Mr. Arthur 7 Stein, who was a donor to the Middle East Forum and 8 was the subject of a donation issue. There was a 9 complaint that dealt with technology beyond that of 10 the website, and that specific technological 11 complaint dealt with a company called Hybros, 12 H-y-b-r-o-s. There was -- and this is all just based 13 on the minutes, so -- I mean, I guess you'll see this 14 reflected, but if there is a disparity between what's 15 in the minutes versus what I'm talking about, then I 16 hope that you'll allow me to correct that. Is that 17 fair?</p> <p>18 Q. Yeah, no one is going to hold you to 19 anything -- you're doing this by memory, it's fine.</p> <p>20 A. I'm just doing this by memory, so I'm 21 just trying to jog whatever came up from that memo 22 that I saw.</p> <p>23 Q. It's also -- it's not a test, so --</p> <p>24 A. No, not saying a test; I'm trying to 25 give you what I remember seeing from that memo.</p>
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<p>1 Q. Okay. What's number two?</p> <p>2 A. Number two is a complaint that Matthew 3 Bennett filed against Marnie Meyer backing the 4 complaint of Lisa Barbounis on October 30th of 2018.</p> <p>5 Q. All right. Number three.</p> <p>6 A. The third is a complaint that Lisa 7 Barbounis raised against Stacey Roman on October -- 8 I'm going to say it's in October of 2018, but I also 9 think that was a subject of that meeting as well.</p> <p>10 Q. Okay. Is there anything else?</p> <p>11 A. Yeah, a complaint that Daniel Pipes had 12 registered to me prior -- two times prior actually -- 13 to November 5th, 2018. The first would have been a 14 continuation of a conversation that took place in 15 2017 and the second was the continuation of a 16 conversation that took place in 2018. I think 17 probably November 5th, 2018, was the -- you know, the 18 final event of what Daniel Pipes would -- I would 19 characterize, I don't know how Daniel Pipes would 20 characterize it, two years of Daniel Pipes's 21 frustration with my management style.</p> <p>22 Q. All right. So that's four things that 23 we have. Is there any more?</p> <p>24 A. Yeah, I think that there was a 25 complaint that dealt with the construction of a</p>	<p>1 Again, I'll reiterate, I wasn't there, so I can't -- 2 you know, this is all -- I don't know if it's hearsay 3 or whatever the legal term for it is, but I'm trying 4 to give you what I recall from seeing from this memo. 5 Okay?</p> <p>6 Q. Yeah. Is there -- so I have one, two, 7 three, four, five, six, seven other reasons other 8 than these women's allegations that led to the 9 meeting in -- in November 5th, 2018.</p> <p>10 A. You're saying that those allegations 11 led to the meeting; what I'm saying is that to 12 this day I have never had the opportunity to directly 13 address those allegations to those women. I mean, I 14 guess I see -- I see Ms. Barbounis is on this call 15 right now, so this is actually probably the first 16 time that I've ever commented on this, at least one 17 on one to a public forum that's of a nonlegal venue, 18 but -- I guess it is a legal venue, right, though -- 19 because you're the -- you're the attorney who is 20 deposing me today, but, again, these issues were a 21 milieu -- there's also some characterizations of what 22 Mr. Pipes --</p> <p>23 Q. Well, wait, let me just back you up.</p> <p>24 A. Sure.</p> <p>25 Q. Did Mr. Pipes ever talk to you about</p>

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1	the allegations that these women made? Did he ever	1	Q. What is your general understanding --
2	sit down and have a conversation with you about it?	2	A. I was about to answer your general
3	A. He had a conversation that I think he	3	question. Of a general question, she was unhappy at
4	observed that was with counsel, yes.	4	the Middle East Forum.
5	Q. So I'm not talking about -- I'm not	5	Q. Well, did she make any specific
6	talking about, you know, litigation strategy	6	allegations regarding you?
7	sessions. I'm talking about --	7	A. She's never made an allegation to me,
8	A. I'm not talking about litigation. I'm	8	no.
9	not talking about litigation. I'm saying --	9	Q. About you.
10	Q. What I'm trying to ask you about is --	10	A. She has, and those I believe are
11	A. Sure.	11	memorialized in a document that I saw after this
12	Q. -- did Daniel Pipes ever sit down with	12	litigation began that I think was sent in November of
13	you and just have a conversation with you about these	13	2018 but you would have to be able to bring a
14	allegations and what are we going to do about it type	14	document forward for me to accurately comment on.
15	of thing?	15	Q. Well, I'm asking you what's your
16	A. Which allegations, the one I just	16	understanding of the allegations that she made
17	enumerated or other allegations?	17	regarding you.
18	Q. The allegations that Patricia McNulty,	18	A. Again, there was I believe more than
19	Marnie Meyer, and Lisa Barbounis made in November of	19	one allegation, so you would have to be specific
20	2018.	20	showing me what they are so that I could give you the
21	A. You have to be specific about the	21	best answer with all of my honesty and truthfulness
22	allegations because I can't offer a answer in	22	regarding the specific nature of what it is that
23	totality unless you specifically get to the	23	you're trying to get me to comment on.
24	allegations that you're talking about.	24	Q. Well, I want you to tell me everything
25	Q. That's fine.	25	that you think she said about you when she made
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1	MR. CARSON: Can we -- do you guys	1	allegations regarding you in November of 2018.
2	mind if we do like a little -- I need --	2	A. Everything that you want me to think
3	I have like a lump in my throat that's	3	about, there is many things. For instance --
4	going crazy. I need to get like a cough	4	Q. Everything that you know, everything
5	drop and go to the bathroom. Do you	5	that you remember, everything that you were told,
6	guys mind if we do a ten-minute break?	6	any --
7	THE VIDEO SPECIALIST: We are now	7	A. It's -- first of all, there's --
8	off the record, it's --	8	Q. -- based on any knowledge that you
9	THE WITNESS: Sure.	9	have.
10	THE VIDEO SPECIALIST: -- 12:47	10	A. -- there is many things that I remember
11	p.m.	11	about Tricia McNulty. There is many things that I --
12	(A brief recess was taken.)	12	Q. Mr. Roman, I'm going to stop you. I'm
13	THE VIDEO SPECIALIST: We are now	13	not asking you to tell me everything that you
14	on the record. It is 1:02 p.m. Eastern.	14	remember about Patricia McNulty. Do you understand
15	BY MR. CARSON:	15	--
16	Q. Mr. Roman, what are your -- what's your	16	MR. GOLD: Objection. That
17	understanding of the allegations that Patricia	17	question is way too broad. If you
18	McNulty made against you in November of 2018?	18	narrow it, we'll let him answer it.
19	A. The understanding of which allegations?	19	Everything he knows -- it's just
20	Q. Any of them. What's your understanding	20	outrageous. He's not going to answer
21	of what she said about you in November of 2018?	21	that question.
22	A. Well, you would have to be able to go	22	MR. CARSON: Sidney, you're not
23	over the factual predicate for each allegation in	23	even objecting to the question.
24	order for me to comment on it I think. Of a general	24	MR. GOLD: I am objecting to it.
25	nature --	25	It's a ridiculous question.

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1	MR. CARSON: There wasn't a question.	1	1st or around November 1st, 2018. Okay?
2	MR. GOLD: And from what --	2	A. Well, there was -- you know, I've
3	MR. CARSON: There wasn't a question.	3	become aware after this litigation started of many
4	MR. GOLD: How about --	4	things that she said both on and around November 1st
5	MR. CARSON: You're objecting to nothing right now.	5	of 2018. There is something like 17,000 messages
6	THE COURT REPORTER: I can't hear -- excuse me. I can't hear each of you when you're both talking at the same time.	6	that exist between -- that's maybe not an accurate
7	MR. GOLD: I'm going to object. The question lacks any modicum of specificity with regard to --	7	number, might be 16,000 --
8	MR. CARSON: No one asked the question you're objecting to.	8	Q. Not asking you about messages.
9	MR. GOLD: Yes, you did. You asked a question and I'm directing him not to answer until you rephrase it.	9	A. -- might be 18,000 -- I'm trying to
10	MR. CARSON: Mr. Gold, you're objecting to something that no one asked. I didn't ask him tell me everything you remember about Patricia McNulty --	10	give you comment here to the best of my ability.
11		11	Q. My question is who -- your
12		12	understanding who she made those allegations to, who
13		13	did she report that to.
14		14	A. Which allegations are you speaking
15		15	about, Mr. Carson? I have --
16		16	Q. Any.
17		17	A. -- yet to see a document.
18		18	Q. Any of them.
19		19	A. Any of which allegations?
20		20	Q. Well, how many --
21		21	A. For instance, I'll give you an
22		22	allegation that she --
23		23	Q. Please stop.
24		24	A. Sure.
25		25	Q. We're going to do this clean. Okay?
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1	(Simultaneous speakers.)	1	A. Let's do it clean.
2	MR. CARSON: What I said was I'm not asking you about everything you said about Patricia McNulty. So just listen, please.	2	Q. So around November 1st, 2018, do you
3		3	understand that Ms. McNulty reported certain conduct
4		4	related to you to Mr. Pipes?
5		5	A. I understand that -- actually did -- do
6	BY MR. CARSON:	6	I understand if Ms. McNulty --
7	Q. Anyway, what I'm asking you specifically is do you recall that around November 1st, 2018, Ms. McNulty made allegations about you, she reported something to Daniel Pipes about you, do you recall that?	7	Q. It's a yes or no question.
8		8	A. -- reported -- hold on. I'm trying to
9		9	frame it here so that I can give you the best answer
10		10	to the best of my ability, Mr. Carson. Do I
11		11	understand that around November 1st of 2018 Tricia
12		12	McNulty made allegations to Daniel Pipes about my
13		13	conduct. You got to be more specific, in what
14		14	capacity. Because there is a few things that she
15		15	said that I can give you the answer here to.
16		16	Q. Give me the first thing that you
17		17	remember.
18		18	A. The first thing that I remember is a
19		19	text message that Tricia McNulty sent to Lisa
20		20	Barbounis saying what's your Gregg plan. That's one
21		21	thing I remember about her concocting allegations
22		22	about me that she said to Lisa Barbounis that I think
23		23	she then delivered to Lisa Barbounis -- to Lisa
24		24	Barbounis and --
25		25	Q. Well, when did you see --

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1	A. -- Daniel Pipes.	1	stories over the last two years and I'm trying to
2	Q. -- that message?	2	figure out what story are you trying to refer to.
3	A. That was in the two hundred thousand	3	Q. I'm asking you -- so you just said
4	plus messages that you handed over to the Middle East	4	Daniel Pipes sent you an e-mail about these
5	Forum on August 16th, 2020.	5	allegations, correct?
6	Q. Okay. So I'm -- I'm not talking about	6	A. The e-mail that you sent me a draft of
7	what you saw on discovery.	7	whether or not that was the specific e-mail that I
8	A. So that's why I need you to be	8	got, but you have to be able to show me the documents
9	specific. You got to tell me what you're talking	9	for me to comment on it.
10	about.	10	Q. No, I'm asking you a question,
11	Q. I am being specific. My question is	11	Mr. Roman, about -- you said that Daniel Pipes sent
12	did Daniel Pipes ever notify you that there was	12	you an e-mail where he notified you that certain
13	allegations made against you.	13	allegations were being made.
14	A. Did Daniel Pipes ever notify me that	14	A. Right, that's -- I think you just
15	there were allegations made against me. We talked	15	showed me a draft of an e-mail that I received.
16	about the managerial allegations beforehand, so I	16	Q. Well, there was nothing about
17	think my record stand -- I think my answer stands on	17	allegations in that draft.
18	the record about what I recall --	18	A. There definitely was, that said, in
19	Q. Talking about the allegations of	19	parentheses, if you go back to it, if we can refer to
20	Patricia McNulty.	20	that document -- can we refer to Roman 1 as the
21	A. What allegations --	21	exhibit so I can give a comment on it for a second?
22	Q. It's a yes or no --	22	Go up to the first paragraph. Interim
23	A. -- Mr. Carson?	23	because the office and I are reeling from the sudden
24	Q. Did Daniel Pipes ever tell you that she	24	changes this month. That seems like there has to be
25	made allegations in November -- around November 1st,	25	a predicate for changing this job and that looks like
1	2018?	1	that could be something dealing with changes in the
2	A. Mr. Pipes --	2	office, and I took that to be that there was a change
3	Q. Did she ever tell you that?	3	that took place. Now, I know -- I know that there is
4	A. Mr. Pipes --	4	another e-mail --
5	Q. Did he ever tell you that?	5	Q. Is there anything about Ms. McNulty's
6	A. -- wrote me an e-mail that said certain	6	allegations in this document?
7	individuals have said certain things about you and	7	A. No, but I think that what he's
8	those certain things have led me to conclude that you	8	referring to is a second e-mail --
9	are no longer in a position to handle the	9	Q. I wasn't asking you what he's referring
10	administration of the Middle East Forum anymore. In	10	to. So -- there is not. So my question --
11	terms of what Ms. McNulty said, I don't have a record	11	A. I think there is, though. I think
12	of a specific allegation made to me on November 1st,	12	there is.
13	2018, because this is information I became aware of	13	Q. Where? Show me where they're talking
14	in its totality after you filed -- not you, excuse	14	about --
15	me, that's incorrect. -- after your clients filed an	15	A. When he says "are reeling from the
16	Equal Employment Opportunity Commission complaint	16	sudden changes." Okay? So when he's --
17	against me --	17	Q. You're --
18	Q. Okay. But we're not talking about --	18	A. -- talking about sudden changes -- this
19	A. No, but I'm saying, because this is the	19	is just my interpretation --
20	thing, right? You're saying which allegations,	20	Q. Let me get a question out and then you
21	right? There is actually, from what I understand, at	21	answer the question. Okay?
22	least five different versions of allegations that may	22	A. Sure.
23	be of the same nature around the same alleged series	23	Q. So is it your testimony that that
24	of events which are of all different natures. That's	24	phrase in this document is referring to Ms. McNulty's
25	why it's so confusing. You've told five different	25	allegations?

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1	A. No, it's not, not at all. What it is	1	possible --
2	is is that the --	2	Q. You got to stop talking over me.
3	Q. But my --	3	A. -- so the record reflects what
4	A. -- sudden changes refer to the totality	4	happened.
5	of what he said was --	5	Q. All right? You got to stop talking
6	Q. Mr. Roman, I'm --	6	over me. My question is simple. Sitting here today
7	A. -- change that took place in the	7	do you ever recall an e-mail that you were ever sent
8	office.	8	by Mr. Pipes specifically about Ms. McNulty's
9	Q. You got to just let me get my questions	9	allegations?
10	in. You got to --	10	A. Which allegations are you talking
11	A. Well, you asked me a question. You	11	about, Mr. Carson?
12	said is it your testimony that this refers --	12	Q. Allegations she made November 1st,
13	Q. Right.	13	2018, or around that --
14	A. -- to Tricia McNulty's allegations --	14	A. You got to be specific. I just told
15	Q. You said no.	15	you one allegation where she said --
16	A. -- in quotation marks --	16	Q. Do you recall any e-mail about her
17	Q. You answered the question.	17	allegations, yes or no?
18	A. -- and -- I didn't say no. I said no I	18	A. Which --
19	think that it refers to the totality of what	19	Q. If you don't -- or I don't know.
20	Mr. Pipes described as sudden changes in the office	20	A. Mr. Carson --
21	that may or may not have included these whatever	21	Q. Yes, no, I don't know.
22	allegations that you haven't specified include.	22	A. -- the factual -- the factual predicate
23	Q. Okay. Is there another e-mail that	23	of the question that you're asking is not specific
24	Mr. Pipes sent you where he referred to Ms. McNulty's	24	enough to allow me to comment.
25	allegations?	25	MR. CARSON: All right. We're
	Page 81		Page 83
1	A. I don't know if he's referring to Ms.	1	going to stop and call the Court. Okay,
2	McNulty, but I did get another e-mail from Mr. Pipes.	2	guys? This is getting ridiculous, so --
3	Q. Did you ever get an e-mail from	3	all right. Thank you.
4	Mr. Pipes specifically about Ms. McNulty's	4	THE VIDEO SPECIALIST: We're off
5	allegations?	5	the record. It's 1:15 p.m. Eastern.
6	A. I don't know. You would have to give	6	MR. CAVALIER: I would defer to
7	me the opportunity to read through all the discovery	7	Mr. Gold in this respect, but if we're
8	that we handed over to you. I think we gave you like	8	going to do a call to the Court I would
9	five or six thousand documents. So if you in	9	at least like to have a discussion about
10	preparation --	10	whether it should be on the record.
11	Q. Sitting here today.	11	MR. CARSON: Well, I'm going to
12	A. -- for today's deposition be able to	12	start calling right now. You guys can
13	provide me that --	13	have that discussion if you want. I
14	Q. Mr. Roman --	14	don't care.
15	A. -- I could probably comment on it.	15	MR. CAVALIER: All right. Well,
16	Q. You can just say I don't know and then	16	if nobody has any opinion on it, then I
17	we can move on --	17	would ask that we stay on the record for
18	A. Well, Mr. Carson, I believe that as the	18	this call.
19	deponent in today's deposition I'm trying to provide	19	MR. GOLD: Correct.
20	you the best recollection of my knowledge as it	20	MR. CARSON: No. I have an
21	relates to the questions that you are offering	21	opinion. We're not on the record.
22	today --	22	THE COURT REPORTER: Are we on the
23	Q. Okay. Thank you.	23	record or off the record, please?
24	A. -- and I would like to be able to do	24	MR. CARSON: Off the record.
25	that in the most -- with the most efficacy as	25	We're not wasting time with this. This

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1	is ridiculous.	1 Patricia McNulty was making an allegation involving
2	MR. CAVALIER: I disagree. As far	2 sexual harassment against you?
3	as I'm concerned, we have to remain on	3 A. Patricia McNulty. I would have to say
4	the record unless we all agree to go	4 without the specific day the beginning of November
5	off.	5 2018.
6	MR. CARSON: Well, you can't go on	6 Q. How did you find that out?
7	the record -- we're already off the	7 A. It was communicated to me in an e-mail.
8	record. You can't go on unless we agree	8 Q. Was that e-mail from Daniel Pipes?
9	to go on.	9 A. I don't remember.
10	MR. CAVALIER: I didn't agree to	10 Q. What did the e-mail say?
11	go off the record, Seth.	11 A. There was a -- like I said beforehand,
12	MR. GOLD: We're not going off the	12 a general e-mail saying that these people have said
13	record. Stay on the record.	13 that you have done something and then you have said
14	MR. CARSON: We are off the record	14 that you did not do those things.
15	right now.	15 Q. Right, but that's not when you first
16	MR. CAVALIER: We're on the	16 found out about it because the e-mail that you're
17	record.	17 referencing talked about your response, right?
18	MR. CARSON: They already said off	18 A. Right, but what I'm saying is is is
19	the record. No, we're not.	19 that there was an e-mail where I was told that there
20	MR. CAVALIER: You said off the	20 were issues that took place, I don't remember the
21	record. I didn't say it, Sid didn't say	21 specificity of the e-mail, I don't remember if it was
22	it; you can't unilaterally go off the	22 conversation that took place beforehand -- this is
23	record.	23 something that's, what, like two years ago, three
24	MR. CARSON: Well, we're not on	24 years ago -- so if you, you know, look at this --
25	the record right now. Sorry.	25 Q. Is this the e-mail you're talking
	Page 85	Page 87
1	THE VIDEO SPECIALIST: I called it	1 about?
2	off the record, gentlemen. I said we're	2 A. As you know, there have been several
3	off the record.	3 allegations -- let me read the whole e-mail first.
4	MR. CAVALIER: Well, then when we	4 Can you go down?
5	get on the call with the Court, we're	5 Q. I believe that's it.
6	going to raise this issue.	6 A. Yes, as it relates to allegations of a
7	THE COURT REPORTER: I can't go	7 nature as you describe regarding Patricia McNulty,
8	off unless you all agree, so it's been	8 there was a conversation with counsel that I believe
9	on.	9 I'm not supposed to talk about and then this is the
10	MR. CAVALIER: Good, because we	10 first time I received a formal notice of those
11	didn't all agree.	11 allegations in an e-mail from Daniel Pipes to me on
12	(A call was placed to Judge Wolson.)	12 what looks like here is Friday, November 2nd, at
13	(A discussion was held with Judge	13 11:51 in the evening.
14	Wolson via speakerphone wherein	14 Q. You received this e-mail on 11/2/18,
15	it was agreed that the discussion	15 correct?
16	would be off the record.)	16 A. Well, it says Friday, November 2nd,
17	THE WITNESS: Could I take two	17 2018, 11:51 p.m., that's UTC time, so that's, what,
18	minutes to use the restroom?	18 like four hours ahead of Eastern time, so it's
19	MR. GOLD: Yeah, go ahead.	19 probably 7, 8 p.m., something like that.
20	THE WITNESS: Thank you.	20 Q. 7 or 8:00 on November 2nd?
21	(A brief recess was taken.)	21 A. Yeah, in the evening. That's what the
22	THE VIDEO SPECIALIST: We're back	22 time stamp says.
23	on the record. It is 1:48 p.m. Eastern.	23 Q. Okay. So the e-mail says there have
24	BY MR. CARSON:	24 been several allegations of improper conduct directed
25	Q. When did you first find out that	25 against you. The Middle East Forum takes these

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1	allegations very seriously. Accordingly, I	1	question.
2	investigated this matter yesterday, immediately upon	2	THE WITNESS: Sure. I've had many
3	learning of it.	3	conversations with Mr. Pipes about the
4	Did Daniel Pipes talk to you yesterday,	4	-- what I believe is where you're
5	November 1st?	5	talking about, the several allegations
6	A. Yesterday was November 19th, so you	6	of improper conduct that you mention
7	mean --	7	here. We've had conversations about it
8	Q. No, yesterday --	8	in November of 2018, we've had
9	A. -- do you mean he spoke to me --	9	conversations about it many times.
10	Q. I'm talking about --	10	BY MR. CARSON:
11	A. What do you mean?	11	Q. Not talking about that. We're talking
12	Q. -- yesterday -- when I say yesterday, I	12	about this letter here. So it says you maintain you
13	mean quote/unquote yesterday. Did he talk to you on	13	never made such advances, so that -- you told
14	November 1st, 2018?	14	Mr. Pipes that?
15	A. I don't remember.	15	A. I have maintained since the start of
16	Q. You don't -- when do you remember	16	this entire process that I have not -- what's the
17	talking to Daniel Pipes about this?	17	best way to put it that will answer this the best
18	A. I've spoken about him many times since	18	way.
19	this e-mail was received.	19	Q. My question is --
20	Q. When is the first time you remember	20	A. I'm telling -- I'm giving you my
21	talking to him about this?	21	answer, Mr. Carson.
22	A. I don't remember. It would probably be	22	Q. It's did you tell Mr. Pipes that. That
23	sometime around November 2nd, 2018. It's the first	23	was my question.
24	time I have an e-mail communication from him about	24	A. I have told Mr. Pipes on many occasions
25	it.	25	and I have told other individuals on many occasions
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1	Q. Well, it says that you maintain you	1	the same answer that I give to you now. I did --
2	never made such advances, so who did you maintain	2	Q. I'm not asking you -- I'm not asking
3	that to?	3	you --
4	A. I believe that anything that I would	4	A. I'm telling you -- I'm telling you what
5	have said would have been in the process of an	5	I told Mr. Pipes.
6	investigation with counsel. Now, I'm going to ask my	6	Q. No, your -- your answer is
7	attorney for a legal opinion whether or not I should	7	nonresponsive right now. I'm asking you about --
8	answer that.	8	A. Mr. Carson, please let me make the
9	Q. It's not privileged. It's in this	9	answer and I can give --
10	letter.	10	Q. No.
11	A. I'm not asking you, Mr. Carson. I'm	11	A. -- you an answer.
12	asking my counsel.	12	Q. No, no. I'm asking you specifically,
13	THE WITNESS: Counsel --	13	when Mr. Pipes writes to you that you maintain you
14	MR. GOLD: Can you please read the	14	never made such advances, that's something you told
15	question back?	15	him? Yes or no.
16	BY MR. CARSON:	16	A. I have told --
17	Q. Who did you maintain that you never	17	Q. Yes or no.
18	made such advances to? Who did you tell that to?	18	A. I have --
19	You told that to Mr. Pipes?	19	Q. Is that something you told Mr. Pipes?
20	THE WITNESS: Counsel, can I	20	A. Mr. Carson, if you'll let me please
21	answer this? Can I comment --	21	answer, I would like to be able to give the answer to
22	I'm seeking a legal opinion,	22	you.
23	Mr. Carson.	23	Q. You got to start with yes or no then.
24	MR. GOLD: He asked you what you	24	A. Please don't instruct me on how to give
25	told Mr. Pipes. You can answer the	25	my answer.

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1	(Simultaneous speakers.)	1	Q. I'm not asking about Mr. Fink.
2	THE COURT REPORTER: I can't hear	2	A. -- the -- Mr. Carson --
3	anybody when you're all talking at the	3	Q. I'm not -- I said is that something you
4	same time.	4	had --
5	MR. GOLD: Mr. Carson, ask the	5	A. Mr. Carson --
6	question, let him answer; if you're not	6	Q. -- you talked to Mr. Pipes about.
7	happy with the question, then, you know,	7	A. -- I'm trying to give you an answer.
8	rephrase it or do whatever you need to	8	Q. I know. It's a yes or no question,
9	do, but no argument, please, wasting	9	though. Is that something you talked to Mr. Pipes
10	time.	10	about.
11	BY MR. CARSON:	11	A. Mr. Carson, I do not recall if
12	Q. Mr. Roman, my question is about this	12	Mr. Pipes is the individual that I gave these answers
13	sentence here. Is this something that you told	13	to. What I'm trying to tell you is that I
14	Mr. Pipes, yes or no.	14	participated in an extensive interview with counsel
15	A. Again, Mr. Carson --	15	about these allegations --
16	Q. I'm not asking you about every time you	16	Q. When?
17	told him. I know. You told him a lot of times you	17	A. -- and -- before, when they were made.
18	didn't do it. I get it. But I'm asking you --	18	I think --
19	A. I'm trying to get an answer out.	19	Q. When --
20	Q. -- about this letter.	20	A. -- that I had -- I think that I had --
21	A. I'm trying to get an answer out.	21	Q. Well, when did you have this
22	You're interrupting me every time I give an answer.	22	conversation?
23	Q. All right. I'll rephrase the question.	23	A. -- a -- I think that I had a
24	When Mr. Pipes says you maintain you never made such	24	conversation with Mr. Fink sometime between October
25	advances, when did you maintain that? When did you	25	31st and the writing of this e-mail, so within that
	Page 93		Page 95
1	tell him that?	1	48-hour period there was an investigation that was
2	A. Well, you're again asking that question	2	launched by in-house counsel and to these allegations
3	that relies on a factual predicate that may or not be	3	as per the policy of the Middle East Forum and I
4	true because I don't remember it. What I'm trying to	4	believe that the results of that investigation was
5	tell you is --	5	conveyed to Mr. Pipes. That's my answer.
6	Q. It might not be true --	6	Q. So Mr. Pipes wasn't there when you said
7	A. I'm --	7	that you acknowledge your intentions were not
8	Q. It might not be true that you didn't	8	acceptable and put these employees in a difficult
9	tell him that?	9	position.
10	A. I may have said to counsel something	10	A. I don't know because I was speaking to
11	that I don't know whether or not I'm allowed to do,	11	Marc Fink --
12	but in general, Mr. Carson, I have always maintained	12	Q. Was Mr. Pipes present?
13	to Mr. Pipes and to anyone else that all of these	13	A. -- okay -- I know that there was a
14	allegations are untrue.	14	conversation with Marc Fink about this entire
15	Q. It says -- the next thing it says is	15	litany --
16	and that you -- and -- you maintain you never made	16	Q. Okay.
17	such advances and did not know they felt	17	A. -- of what came forward. Now, whether
18	uncomfortable. But you acknowledge that your	18	Mr. Pipes --
19	conduct, whatever your intentions were, were not	19	Q. I understand. I understand.
20	acceptable and put these employees in a difficult	20	A. Now, whether Mr. Pipes was present
21	position.	21	there or not, I don't know.
22	So that's something you had a	22	Q. Okay. Did you ever have a conversation
23	conversation with Mr. Pipes about, correct?	23	with Mr. Pipes where you made comments like this,
24	A. No, Mr. Carson, Mr. Fink	24	where you said that you acknowledge that your
25	investigated --	25	intentions -- you acknowledge your conduct, whatever

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<p>1 your intentions were, were not acceptable and put      2 these employees in a difficult position, did you ever      3 have a conversation with Mr. Pipes where you said      4 that?</p> <p>5 A. We have to break it down. First of      6 all, about Mr. Pipes, I, again, don't know if he was      7 there or not. I did speak with in-house counsel.      8 Second, as it relates to conduct, which conduct are      9 we talking about?</p> <p>10 Q. Well, which conduct were you talking      11 about when you said that?</p> <p>12 A. Well, I don't know if I said this --      13 what I'm saying is is that the conduct you're      14 trying to get me to refer to in general was my      15 managerial style that I think, and I'll try to offer      16 you a little positive matter now so we get this      17 moving a little bit forward, was one in which blended      18 professional and personal relationships, personal of      19 a friendly nature, not one of a sexual nature,      20 Mr. Carson.</p> <p>21 Q. So when you --</p> <p>22 A. So the mistake -- if I can finish. So      23 the mistake that I may be referring to in any conduct      24 that allegedly took place prior to November 2nd,      25 2018, 11:51 p.m., was one in which I thought that the</p>	<p>1 A. I don't remember.      2 Q. Well, how many conversations did you      3 have with him back in 2018?      4 A. I have had probably thousands of      5 conversations with Mr. Pipes in 2018.      6 Q. No, I didn't ask you how many      7 conversations you had with Mr. Pipes in 2018. I      8 asked you how many conversations have you had with      9 Mr. Pipes about Patricia McNulty's allegations of      10 sexual harassment in 2018.      11 A. I don't recall.      12 Q. Was it more than one?      13 A. I don't recall.      14 Q. Could it be zero?      15 A. No.      16 Q. So it's at least one.      17 A. Yes.      18 Q. Is it at least five?      19 A. Well, again, you have to be specific      20 about the allegations. I'll give you an example.      21 Q. Sexual harassment allegations.      22 A. We -- no, about --      23 Q. I don't need an example. I'm --      24 A. Okay. Mr. Carson, you're asking me to      25 be as specific as possible.</p>
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<p>1 people I worked with were my friends rather than just      2 subordinates or employees. That would take the      3 conduct of going to birthday parties, it would be      4 going out to events like seeing movies, it would      5 be --</p> <p>6 Q. Going to Israel?</p> <p>7 A. -- going -- in terms of going --      8 listen, to -- if you want to finish my answer, I'm      9 trying to give you a little bit of explanation here.</p> <p>10 Q. Would it include going to Israel?</p> <p>11 A. No, not at all. Israel and any trips      12 that would be overseas were of a purely professional      13 nature.</p> <p>14 Q. Okay. So my question is, have you ever      15 had a conversation with Mr. Pipes about Ms. McNulty's      16 allegations of sexual harassment?</p> <p>17 A. Yes.</p> <p>18 Q. When?</p> <p>19 A. I've had many conversations with him      20 since she made those allegations.</p> <p>21 Q. Okay. So let me be more specific. Did      22 you ever have a conversation in 2018 with Mr. Pipes      23 about Ms. McNulty's allegations of sexual harassment?</p> <p>24 A. Yes.</p> <p>25 Q. When?</p>	<p>1 Q. I know, I don't need you to give me --      2 A. I'm trying to be as specific as      3 possible.      4 Q. Okay. So just listen to my question      5 and answer the question I'm asking you.      6 A. Okay.      7 Q. Okay? How many times did you talk to      8 Mr. Pipes -- and I know you've already answered that      9 you think it's -- it's at least one. My question is,      10 do you think it's at least five times that you've      11 talked to Mr. Pipes about sexual harassment      12 allegations from Ms. McNulty in 2018? Is it like      13 five times?      14 A. I don't know if it's five.      15 Q. So is it fair to say it's probably      16 between one and five? Can we put it --      17 A. No, it's not fair to say because I      18 can't give you the exact number, but if you would      19 like me to tell you what I think I spoke to him      20 about --      21 Q. Yeah, let me ask the question then. So      22 --      23 A. Sure.      24 Q. -- the one time that -- the at least      25 one time that you can recall, can you describe where</p>

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1	-- can you say where you were when you had that	1	Q. We're looking at that e-mail right now.
2	conversation?	2	A. I know, I'm saying this, I'm saying
3	A. No, it's of a general nature.	3	they say you made unwanted sexual advances toward
4	Q. Well, do you know -- were you in the	4	them.
5	Middle East Forum office? Was it over the phone? Do	5	Q. Okay.
6	you know that?	6	A. That's the conversation with Pipes.
7	A. No, I have not been in the Middle East	7	He's saying these people made allegations against
8	Forum office at least between November -- was it even	8	you, they said you made advances towards them, and my
9	beforehand because I was in Los Angeles when many of	9	response was no I didn't.
10	these things were taking place, I wasn't even in	10	Q. Okay. Did Mr. Pipes ever call you
11	Philadelphia until that weekend.	11	again and get more specific with the allegations?
12	Q. So it was probably over the phone; is	12	A. Everything that I've been having with
13	that fair to say?	13	this was through counsel. Now, as it relates to the
14	A. Yeah. I have not been in the Middle	14	conversations that I had with Mr. Pipes, he would say
15	East Forum office. I was not in the Middle East	15	quite often to me, and this is why I can't tell you
16	Forum office during this entire time, maybe one time	16	if it was McNulty or if it was somebody else, Gregg,
17	to film a video and I was at Lisa Barbounis's	17	you're in this position because you were not a good
18	initiation.	18	manager, and then subsequent positions took place not
19	Q. When you say this entire time, what do	19	about sexual harassment but in the way in which he
20	you mean? From when to when?	20	thought that I was too stern of a boss as it related
21	A. Between the time that these allegations	21	to the people who were under me until November 1st,
22	were made until now. I mean, I think I've been there	22	two -- or November 2nd here, 2018, when all
23	probably twice.	23	managerial authorities were removed from my remit as
24	Q. Okay. So it's fair to say that the at	24	director of the organization.
25	least one conversation you had with Mr. Pipes was	25	Q. Everything we're talking about right
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1	over the telephone.	1	now, though, has to do with allegations that Patricia
2	A. Yeah, probably, and there was actually	2	McNulty -- you asked for specificity. This is what
3	probably ten weeks between this taking place and	3	--
4	January of 2019 where I didn't even see him. I was	4	A. Yeah, I'm saying the specific
5	completely removed from the office.	5	allegations.
6	Q. So we're just talking about	6	Q. Mr. Roman, wait for the question. Just
7	conversations with Daniel Pipes in connection with	7	wait for the question.
8	Patricia McNulty's allegations of sexual harassment.	8	A. Sure.
9	A. Right. But, again, Mr. Carson, there	9	Q. Everything that we're doing right now,
10	has to be specificity regarding these allegations	10	everything we're talking about right now, all the
11	because there are five different versions from my	11	questions I'm asking you right now, are regarding
12	account --	12	Patricia McNulty's allegations of sexual harassment
13	Q. But there weren't five versions --	13	that occurred in 2018, and every conversation I'm
14	A. -- of what these accusations --	14	asking you about right now I'm asking you to limit it
15	Q. Were there five versions in 2018?	15	to 2018, so we're only talking about that window from
16	A. There was multiple versions, yes.	16	about November 1st, 2018, to December 31st, 2018.
17	Q. All right. What are the versions you	17	That's all -- all right? So I haven't even asked a
18	remember there being in 2018?	18	question, but I'm just -- that's what I'm asking --
19	A. Well, I don't remember the specific	19	A. Yeah.
20	versions. I remember --	20	Q. All right.
21	Q. Well, how do you know --	21	A. Frankly --
22	A. -- that there was an e-mail that I	22	Q. So my question is --
23	received which said that Lisa Barbounis, Tricia	23	A. Frankly, the specificity of what,
24	McNulty, and Marnie -- this is the words here, says	24	Mr. Carson, you're --
25	they say --	25	Q. All I've done is explain the time line

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1	and the subject so I haven't asked a question.	1	A. I don't --
2	A. Okay. But I'm trying -- I thought you	2	Q. Did you ever say this is what happened.
3	asked a question right there.	3	A. I don't think I did that, no.
4	Q. I haven't.	4	Q. All right. So you -- do you understand
5	A. You said -- I thought you said you want	5	that Ms. McNulty's allegations, one of them, relates
6	to ask about 2018, so --	6	to something that happened at the AIPAC conference?
7	Q. I haven't asked anything yet.	7	A. I understand that it's something that
8	A. -- I was trying to clarify what you	8	allegedly happened at the AIPAC conference, not
9	said.	9	something that happened. Please be specific.
10	Q. I have not asked a question yet.	10	Q. Well, I think I'm being specific when I
11	A. Okay. Go ahead.	11	say that the allegation relates to something that
12	Q. Just wait for the question. All right.	12	happened -- I'm saying it's an allegation --
13	The question is, during that time frame and related	13	A. You're saying something happened at
14	to that one person, Patricia McNulty, and allegations	14	AIPAC. I'm saying something didn't happen at AIPAC.
15	of sexual harassment, the conversation that you	15	Q. Mr. Roman, I can say allegation twice
16	recall having with Daniel Pipes --	16	in the same sentence if it helps you.
17	A. Correct.	17	A. Sure. Go ahead.
18	Q. -- is it your testimony that it only	18	Q. The allegation relates to an allegation
19	related to what's said in this letter?	19	at the AIPAC conference. Okay? So when did you find
20	A. My testimony is is that any	20	that out -- when did you find that out?
21	conversations that I ever had with Daniel Pipes in	21	A. Regarding specific allegations about
22	2018 between November 2nd and December 31st regarding	22	what happened specifically at AIPAC, is that what
23	allegations that Tricia McNulty may have made were of	23	you're asking about?
24	a general nature where he said, Mr. Roman, the	24	Q. I'm asking for a date. What is the
25	results of the investigation that was carried out by	25	date or the approximate date that you learned that
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1	in-house counsel are of the following. You have been	1	Ms. McNulty's allegations related to an allegation of
2	accused by Ms. McNulty, and only limiting it to that	2	something that happened at the AIPAC conference?
3	because that's the scope of the questions that you	3	A. I would probably say November 1st or
4	want to ask, of unwanted sexual advances, you	4	November 2nd, whenever I spoke with counsel.
5	maintain that you did not, and I still maintain to	5	Q. So you're telling me you found that out
6	this day that I did not, make any advances towards	6	through information you got from counsel.
7	Tricia McNulty of any nature, and he would say to me	7	A. Anything I found out about allegations
8	we have to do the following actions. He was speaking	8	of any nature regarding a sexual nature that were
9	to me about the results of his investigation which he	9	made against me as it relates to the people here,
10	still maintains to this day were inconclusive and he	10	Lisa Reynolds Barbounis, Tricia McNulty, and Marnie
11	took action because it was mitigating risk with the	11	O'Brien Meyer, all came through counsel.
12	organization rather than following up on the veracity	12	Q. Then -- so then this should be easy for
13	that we now know today is untrue of what she said.	13	you then. So Daniel Pipes never spoke to you
14	So that's the content of my conversations with Mr.	14	specifically about the allegations then.
15	Pipes about Ms. McNulty's accusations here of the	15	A. No, he did speak to me specifically
16	specific nature you'll have to ask if you would like	16	about the allegations but after November 2nd.
17	me to comment specifically.	17	Q. In 2018 did he ever speak to you
18	Q. Did he ever -- did Daniel Pipes ever	18	specifically about the allegations?
19	ask you to provide a statement about what happened in	19	A. He spoke to me generally about the
20	connection with Ms. McNulty's allegations?	20	allegations.
21	A. Any statements that I made were made to	21	Q. So in 2018 you never had a conversation
22	counsel.	22	where Daniel Pipes said, hey, she's saying that this
23	Q. Did you ever write down what happened	23	and such and such happened at the AIPAC conference.
24	on a piece of paper? I'm not asking you to tell me	24	I understand since then you might have had
25	what you wrote; I'm asking whether you wrote it down.	25	conversations during the course and scope of this

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1	litigation.	1	was?
2	A. Yeah.	2	A. No, Mr. Carson, I had a very low
3	Q. But in 2018 --	3	opinion of Laura Frank.
4	A. I had many conversations about this	4	Q. Did you ever say where had you been all
5	since the litigation began.	5	my life?
6	Q. I understand that. But, like -- and	6	A. No, Mr. Carson, I've never said that to
7	I'm not -- that's not what I'm asking about. What	7	Laura Frank.
8	I'm asking about is in 2018 did Daniel Pipes ever	8	Q. Did you ever tell her at approximately
9	tell you that.	9	2 p.m. on April 22nd that -- that you -- you called
10	A. To the best of my recollection I cannot	10	her to discuss plans for the IVP outreach and after a
11	remember having a specific conversation with Daniel	11	minute or two you -- did you sigh and say I need to
12	Pipes without the presence of counsel, and I don't	12	be back in Puerto Rico, and when she said, yeah, I
13	think I ever addressed him directly, about anything	13	can imagine, did you reply next time I'm taking you
14	that Tricia McNulty alleges happened at the AIPAC	14	with me without your husband of course?
15	conference. I did have a conversation which was of	15	A. Who are you speaking about?
16	the nature Tricia McNulty says that you made unwanted	16	Q. Laura Frank.
17	sexual advances against her, what do you say, Mr.	17	A. No, I don't remember that.
18	Roman, and I said absolutely not, didn't happen.	18	Q. Is it possible that you said that?
19	Q. Well, how do you know it didn't happen	19	A. No. Well, you would have to ask --
20	if he didn't tell you what the allegations were?	20	what year are you speaking about?
21	A. Because I've never in my life made a	21	Q. April 22nd, 2016.
22	sexual advance towards Ms. McNulty. That's how I	22	A. No, I would not have said that because
23	know, Mr. Carson.	23	Laura Frank was never an employee of the Middle East
24	Q. Have you ever made a sexual advance to	24	Forum nor did I know Laura Frank on April 22nd, 2016.
25	any woman in your life?	25	Q. Well, was it April 22nd, 2015, then?
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1	A. Mr. Carson, you have to be more	1	A. No, I didn't work at the Middle East
2	specific.	2	Forum on April 22nd, 2015, Mr. Carson.
3	Q. That you work with.	3	Q. Well, was she an employee in April
4	A. If you want to -- if you're asking me	4	22nd, 2017?
5	about my relations with my wife, I think that that's	5	A. Not that I remember, Mr. Carson.
6	spousal privilege that I have. If you're asking me	6	Q. Well, when --
7	about things that happened before I met my wife, that	7	A. She may have been.
8	was a long time ago, sir, so I really can't comment	8	Q. When do you recall that she worked at
9	on that.	9	the Middle East Forum?
10	Q. Have you ever made a sexual advance to	10	A. You would have to check her personnel
11	any woman ever that you've ever worked with?	11	record. I remember when she left the Middle East
12	A. No, I have not.	12	Forum.
13	Q. Have you ever made a sexual advance to	13	Q. When was that?
14	-- let me ask you this. Have you ever said anything	14	A. When she was caught stealing
15	sexually inappropriate to anyone that you work with?	15	information from Daniel Pipes and the Middle East
16	A. Not that I remember, no.	16	Forum's server, she went to the Derek Smith Law Firm,
17	Q. Have you ever told a woman that you	17	she got a --
18	worked with that they should make the desks	18	Q. No, I asked when she -- when she
19	see-through so you can see their legs underneath the	19	stopped working there.
20	desk?	20	A. Like I said, the specific date I don't
21	A. No, Mr. Carson, I've never said that.	21	remember, but I remember the circumstances of how she
22	Q. Did you ever tell Laura Frank where	22	left the Middle East Forum.
23	have you -- how much you loved her?	23	Q. I'll give you a chance to say it. Let
24	A. No, Mr. Carson, I've never said that.	24	me just keep going.
25	Q. Did you ever tell her how great she	25	Did you tell her that you really want

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1	to take her out for dinner and drinks?	1	Lara Szott, for instance, had volunteered with
2	A. No, I never said that, Mr. Carson.	2	Palestinian refugee camps in Israel -- might have
3	Q. Did you invite her to your hotel room?	3	been Sudan -- but, anyway, she had been involved when
4	A. No, I never did, Mr. Carson.	4	she was a masters student at American University in
5	Q. Did you tell her you wouldn't mind	5	activism and advocacy for organizations that were
6	getting a little crazy with her?	6	anathema to the Middle East Forum's positions. For
7	A. No, Mr. Carson, I didn't.	7	instance, she would say I really think that you guys
8	Q. The quote that she alleges is that you	8	have to recategorize what a Palestinian refugee is,
9	said I don't -- I wouldn't mind -- I wouldn't mind	9	and put that in quotation marks in the record, and we
10	getting a little crazy with you. Is that --	10	would say, this at least being from the work that we
11	A. No, Mr. Carson, I never said that.	11	did regarding UNRWA, which is an agency that deals
12	Q. Did Laura Frank ever accuse you of	12	with Palestine refugees, Ms. Szott, we don't see it
13	sexual harassment during her employment?	13	that way, we consider these individuals to be fourth
14	A. No, Mr. Carson, she did not.	14	or fifth generation descendants of individuals who
15	Q. Did you ever go on to her -- did you	15	may back in 1948 be refugees but today they're
16	ever review conversations she had with Lara Sciott?	16	individuals who are trying to take advantage of the
17	Do you remember Lara's last name? I don't pronounce	17	international refugee system. So what we did was we
18	it right.	18	would say we can't pursue that point of advocacy that
19	A. I don't know Lara Sciott, no. If	19	you want to be able to go along with. And then what
20	you're talking --	20	Ms. Szott did in response, and this was categorized
21	Q. S-c-i-o-t-t? How do you say --	21	and I think memorialized in a letter that went to the
22	A. S-c-i-o-t-t, no, we've never had an	22	Lovitz Law Firm, L-o-v-i-t-z, if you're looking for
23	employee named Lara Sciott.	23	the specific record, we have found that your client,
24	Q. S-z-o-t-t, Szott.	24	and I'm not quoting this directly, but we can
25	A. Lara Szott.	25	probably get you the letter that we sent if you want
1	Q. I don't know how to pronounce it.	1	to see it, has engaged in the following activities
2	A. Lara S-z-o-t-t, yeah, she worked at the	2	which were illegal when she was here at the Middle
3	Middle East Forum.	3	East Forum. Abuse of the Computer Fraud and Abuse
4	Q. When did she work at the Middle East	4	Act, stealing information from the Middle East Forum,
5	Forum?	5	taking donor lists -- and specifically what I
6	A. The specific dates I don't remember,	6	remember is there is a website that is called
7	but probably sometime around 2017.	7	WeTransfer. What you can do is is you can take a
8	Q. Were Lara and Laura, did they -- were	8	body of information, upload it to another site, and
9	they friendly with each other when they worked at the	9	then transfer it to a private device, and this is
10	Middle East Forum?	10	what Lara and Laura had facilitated in doing so, very
11	A. Very much so.	11	much like what your client, Mr. Carson, did when she
12	Q. Did you ever review electronic messages	12	took information from MEF and basically took it into
13	they sent each other during your employment at the	13	her own possession without authorization from the
14	Middle East Forum?	14	organization. So what I also find was a common
15	A. Marnie Meyer and Matt Bennett I believe	15	thread between the two things is that they both went
16	initiated an investigation of Lara Szott and Laura	16	to the Derek Smith Law Firm, and that in and of
17	Frank which led to the conclusion, and this is also	17	itself was something that kind of raised alarms in my
18	involved counsel to a certain extent, that they had	18	head when we actually had received the complaint that
19	been stealing information from the Middle East Forum	19	I guess you helped facilitate with the EEOC back in
20	and were planning on using that information to push	20	June of 2019.
21	forward what they characterize as a diametric	21	Q. Did you ever tell Laura Frank that
22	political agenda to the Forum's goals.	22	maybe if you dress better more men would be talking
23	Q. What does that mean like in layman's	23	to you and we would get better media hits?
24	terms?	24	A. No, Mr. Carson.
25	A. So be more -- be more layman's terms.	25	Q. And then she told you that was

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1	inappropriate and you said -- did you say --	1	Q. Did you review anything else related to
2	A. No, Mr. Carson, that never took place.	2	Laura Frank --
3	Q. Well, how do you know you didn't say it	3	A. I reviewed --
4	if I didn't ask the question yet.	4	Q. -- before today's deposition.
5	A. Because the nature of the conversations	5	A. Yeah, like I said, I reviewed the
6	which you are asking me quotes about never took place	6	complaints that you had of Laura Frank and then I
7	with Ms. Frank nor have they ever taken place with	7	went back into our personnel records and looked at
8	any female worker or male worker that I've ever	8	her history with her involvement with MEF that
9	worked with.	9	covered a period of time that the Derek Smith Law
10	Q. So you don't need to hear what the	10	Firm was involved in conversations --
11	women allege; you know it didn't happen.	11	Q. Well, what documents --
12	A. No, because what I did do was before	12	A. -- with her.
13	the deposition today I went paragraph by paragraph	13	Q. -- did you review that related to Laura
14	over a few documents. First document that I reviewed	14	Frank other than the complaint?
15	--	15	A. Well, that's it, I only reviewed the
16	Q. Well --	16	documents that related to her -- that related to what
17	A. -- was the complaint --	17	you wrote about her in the complaint from Lisa
18	Q. -- I didn't ask you what documents you	18	Barbounis.
19	reviewed.	19	Q. So you're saying the only document you
20	A. No, you're saying how do I know, right?	20	reviewed before today that related to Laura Frank was
21	So I'm --	21	Lisa Barbounis's complaint?
22	Q. I didn't say that.	22	A. That's not what I said.
23	A. -- telling you how I know.	23	Q. Well, then what -- what other document
24	Q. I know. I didn't ask that question.	24	other than her complaint did you review?
25	A. What you did ask was how I knew that	25	A. You make allegations in Lisa
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1	whatever you're alleging right now wouldn't be	1	Barbounis's complaint that mention Laura Frank.
2	true --	2	Q. Right.
3	Q. Well, did you review --	3	A. Anything that related to any potential
4	A. -- and I'm providing --	4	allegation that Laura Frank's name was included in as
5	Q. -- any documents --	5	part of Lisa Barbounis's complaint --
6	A. -- I'm providing you an answer.	6	Q. So you --
7	Q. Did you review any documents related to	7	A. -- I went back into Laura Frank's file
8	Laura Frank before today's deposition?	8	--
9	A. In your complaint that you filed with	9	Q. Tell me the specific documents you
10	the Court, whether it was the first complaint or the	10	reviewed.
11	second amended complaint --	11	A. I'm getting to that, Mr. Carson.
12	Q. Mr. Roman, I asked you --	12	Q. Just give me -- Mr. Roman --
13	A. -- or the answer --	13	(Simultaneous speakers.)
14	Q. -- a yes or no question. I said did	14	THE WITNESS: Mr. Carson, I'm
15	you review --	15	trying to be specific.
16	A. Mr. Carson --	16	THE COURT REPORTER: I can't hear
17	Q. -- any documents related to Laura	17	you when you're talking at the same
18	Frank.	18	time.
19	A. -- I'm telling you about the documents	19	BY MR. CARSON:
20	that I reviewed.	20	Q. No, no, I'm -- just tell me the
21	Q. I know. I didn't ask you what	21	documents you reviewed. Give me the names of them.
22	documents they were. I just said did you review any	22	A. Mr. Carson, I'm getting to that --
23	documents related to Laura Frank.	23	there is no named documents.
24	A. I reviewed your complaints that had	24	Q. No, no, there's no getting to that.
25	Laura Frank's name in it.	25	That's the question.

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1	A. Mr. --	1	you would like to see them.
2	Q. Tell me the documents you reviewed.	2	Q. Sure. Since you turned nothing over in
3	There's the complaint. What else is there?	3	connection with Laura Frank, I ask that everything
4	A. Mr. Carson, there are other documents	4	you just referenced that you reviewed before --
5	pertaining to Laura Frank.	5	A. I'm not -- I'm not trying to tell you
6	Q. Well, tell me what they are.	6	that we're willing or not willing to. You're asking
7	A. There's Delaney Yonchek's complaint	7	for -- I'm instructing counsel of course with the
8	that mentions Laura Frank. There is Tricia McNulty's	8	agreement of in-house counsel that the items related
9	complaint that relates to Laura Frank.	9	to Laura Frank's theft of information from the Middle
10	Q. Okay.	10	East Forum, the circumstances for her departure,
11	A. There is Caitriona Brady's complaint	11	definitely be made available to you. They're very
12	that relates to Laura Frank. There is a contingency	12	similar to what your clients did.
13	agreement that Laura Frank stored on her computer	13	Q. So let's continue. So I don't even
14	from the Derek Smith Law Group. So if you would like	14	need to read anything to do with Laura Frank because
15	to --	15	you just -- you deny it all anyway, right? Is that
16	Q. Did you review that contingency	16	--
17	agreement before --	17	A. Hundred percent.
18	A. I did. I did review that, Mr. Carson.	18	Q. Okay.
19	Q. Did you review anything else besides	19	A. Well, let me be more specific, okay --
20	the three -- the four complaints --	20	Q. Yeah, it doesn't matter what she --
21	A. I reviewed the --	21	A. -- because --
22	Q. -- and the contingency agreement.	22	Q. -- said; you deny it.
23	A. I reviewed the letter that the Middle	23	A. No, it's -- if she said that I asked
24	East Forum sent to Laura Frank that related to her	24	her to develop a communication strategy for the
25	termination from the Middle East Forum.	25	Middle East Forum, that would be true, so I can't
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1	Q. Did you review anything else besides	1	deny that, but if you're asking me about something of
2	the contingency agreement, the letter, and the four	2	a sexual nature, there was nothing ever to be
3	complaints?	3	speaking of.
4	A. Any of the documents that were around	4	Q. Yeah, you deny every -- every
5	that is what I reviewed, but nothing else that I can	5	allegation of sexual harassment that any woman ever
6	remember I reviewed around Laura Frank -- I have	6	made in connection with you, correct?
7	reviewed other documents between June of 2019 and	7	A. Yes, I have never sexually harassed a
8	today that relates to Laura Frank, but the specificity	8	woman, Mr. Carson.
9	of those documents I wouldn't be able to tell you	9	Q. You never said anything sexually
10	today.	10	inappropriate about a woman.
11	Q. I'm asking you specifically before	11	A. Your question is what? Have I ever
12	today's deposition, you named four, five -- you named	12	said anything sexually --
13	six documents, you named the four complaints,	13	Q. Have you ever said anything --
14	McNulty, Barbounis, Brady, Yonchek, you named the	14	A. -- inappropriate about a woman?
15	contingency agreement, and you named a letter.	15	Q. Have you ever said anything sexually
16	A. Not just a letter, the letter, anything	16	inappropriate about a woman who you work with?
17	surrounding the letter, so there was --	17	A. No, I have not.
18	Q. Well, what else surrounding the letter	18	Q. So all the allegations that Lisa
19	did you review?	19	Barbounis made, false.
20	A. There was attachments that were with	20	A. Hundred percent false, correct.
21	the letter --	21	Q. All the allegations that Patricia
22	Q. Did you review those before --	22	McNulty made, they're false.
23	A. -- I think that there was -- I don't	23	A. Of a sexual nature? False.
24	remember. This was months in the process of	24	Q. Yeah.
25	being able to go. We do have those attachments if	25	A. Yes.

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1	Q. All the allegations that Leah Merville	1	Mr. Carson.
2	made, they're false?	2	Q. Laura Frank and Lara Szott, everything
3	A. I've never heard any allegations from	3	they said about you in regards to sexual misconduct
4	Leah Merville.	4	or sexual questions or sexual comments, none of those
5	Q. Said that you guys had a sexual	5	happened, correct?
6	relationship. Is that false?	6	A. Nothing happened, Mr. Carson.
7	A. That is false, correct.	7	Q. How about Tiffany Lee, is her entire
8	Q. How about Alana Goodman, is everything	8	charge of sexual harassment involving you, that's all
9	she said false?	9	false, too?
10	A. Alana Goodman, I heard a tape last --	10	A. Tiffany Lee is actually an interesting
11	when was it, on Wednesday --	11	case.
12	Q. Yeah.	12	Q. Well, just answer the question. Is --
13	A. -- or Tuesday, they had provided, so if	13	A. I'm answering your question. She --
14	you would like to go over that tape again I can tell	14	Q. My question is is her charge of
15	you what I believe is true and what's false.	15	discrimination that she filed, are all those
16	Q. Did you take your penis out in front of	16	allegations false?
17	her at a bar?	17	A. Mr. Carson, yes, and -- it's not that
18	A. No, I never did.	18	it's just false, it was fabricated by the Derek Smith
19	Q. Did you yell at her that she needed to	19	Law Firm.
20	come to your hotel room because you had a story	20	Q. Why do you think it was fabricated by
21	there?	21	Derek Smith Law Firm?
22	A. No. I have shared stories with Alana	22	A. You would have to refer to the response
23	Goodman, but I never invited her to a hotel room to	23	of the Cozen O'Connor law firm from 2016 where it was
24	give her a story.	24	proven that Ms. Lee fabricated text messages that
25	Q. You never invited Leah Merville to a	25	were sent to me and then didn't only just fabricate
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1	hotel room?	1	it but also misinterpreted the information. We
2	A. No, I've never invited Leah Merville to	2	actually never received any --
3	a hotel room.	3	Q. What do you think it has to do with
4	Q. Did you ever invite Gabrielle Bloom to	4	Derek Smith Law Group, though?
5	a hotel room?	5	A. Because Derek Smith Law Group wrote the
6	A. No, I have never invited Gabrielle	6	complaint, Mr. Carson. Actually, in fact, the
7	Bloom to a hotel room.	7	attorney who wrote that complaint, I just found this
8	Q. Did you ever subject her to sexual	8	out about two weeks ago, has been working with you to
9	harassment?	9	try to do the same thing that Tiffany Lee tried to do
10	A. No, I did not, Mr. Carson.	10	to us four years ago. And if you want another piece
11	Q. How about Marnie Meyer, everything she	11	of information I found out yesterday when I was
12	said is false?	12	looking over the complaints that you filed against
13	A. Well, you have to tell me what she said	13	the Middle East Forum, myself, Daniel Pipes, and
14	and I can tell you what's true and false.	14	others, Caroline Miller is the woman I'm talking
15	Q. She said that she had to tell you that	15	about, who I actually went to legal advice for, which
16	she's never going to have sex with you, did she say	16	I cannot believe the unethical nature of what she's
17	that to you?	17	trying to do here, it just blows my mind, but, beyond
18	A. No, I never heard that from her, Mr.	18	that, her name --
19	Carson.	19	Q. What do you think --
20	Q. She's lying, correct?	20	A. This is what I found out yesterday.
21	A. What is she lying about?	21	This is what I found out yesterday. Caroline
22	Q. Well, she wrote a complaint, didn't	22	Miller's name --
23	she, where she made that allegation?	23	Q. Well, there's no question on the table
24	A. The complaint where Marnie Meyer wrote	24	about Caroline Miller.
25	anything that was of a sexual nature is incorrect,	25	A. I'm trying to get to -- you asked me

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1	why I think --	1	advice for be involved in drafting complaints --
2	THE COURT REPORTER: I can't hear	2	Q. Mr. Roman, I'm going to ask that you
3	you when you're talking at the same	3	just slow down and stop asking questions and let me
4	time.	4	just --
5	THE WITNESS: Excuse me, Ms.	5	A. Sure. Sure. It's a hypothetical,
6	Carrie.	6	Mr. Carson. You're used to this.
7	You asked me why I think the Derek	7	Q. I'm getting -- I'm just -- I'm trying
8	Smith Law Group was responsible for	8	to give you an opportunity to explain what you're
9	making those accusations. I'm giving	9	talking about --
10	you the answer. Not only was it	10	A. Sure.
11	Caroline Miller who I think was involved	11	Q. -- to this sort of nonissue, but, like,
12	in the administrative action which ended	12	when you talk about metadata, where are you seeing
13	up with a no cause and no lawsuit after	13	this metadata?
14	Tiffany Lee was involved, but upon	14	A. Which metadata are you referring to?
15	further examination when I was preparing	15	Q. To metadata that you just referred to.
16	an affidavit yesterday for a separate	16	A. Well, the metadata that I was referring
17	case, I found out that Caroline Miller's	17	to was the evidence that was in files you provided to
18	name was in the metadata associated with	18	the Middle East Forum.
19	the complaints that you filed with the	19	Q. What files? Where are you seeing --
20	EEOC, and I don't know why an attorney	20	A. Mr. Carson, if you look at the record
21	in Miami as your coworkers --	21	and you're following the record, you'll see this.
22	BY MR. CARSON:	22	EEOC complaints --
23	Q. What does that mean, the metadata?	23	Q. What record? Explain.
24	A. What it means, Mr. Carson, is is that	24	A. The record that the stenographer has
25	an attorney with an obvious conflict of interest --	25	been taking for the past seven minutes that we've
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1	Q. No --	1	been speaking about this. I'll try to do it again so
2	A. -- assisted you --	2	I break it down for you.
3	Q. -- I'm not asking you --	3	Q. Yeah, give it a try.
4	A. -- assisted you --	4	A. I'll give you -- if you'll allow me to
5	Q. I'm not asking you about --	5	give the whole --
6	A. -- in again trying to drum up	6	Q. No, I don't want you to give the whole
7	complaints against the Middle East Forum.	7	-- I want you to say specifically where you saw the
8	Q. I'm asking you --	8	metadata. Let me help you. I sent an e-mail from me
9	A. It's all there -- it's all there in the	9	to my paralegal. If you look at the metadata in that
10	record.	10	e-mail, you'll see that it went from me to my
11	Q. Yeah, what metadata are you referring	11	paralegal.
12	to?	12	A. That's not where the metadata is.
13	A. Okay. If you go to the EEOC complaint	13	Q. Identify where you saw the metadata.
14	that your clients filed against the Middle East Forum	14	A. In the author field of at least one of
15	and if you go to the complaint that was uploaded in	15	the complaints, whether they be the EEOC or the
16	PACER and also in -- I think it was in the e-mails	16	complaints that you filed with the Eastern District
17	you sent to Marc Fink, in-house counsel, and you open	17	of Pennsylvania against the Middle East Forum, Daniel
18	it up, the PDF file, and you look at -- that you have	18	Pipes, myself, and Matthew Bennett, that had the name
19	the time it's written, the subject, the file	19	Caroline Miller.
20	location, and you look at the author line, it says	20	Q. When a complaint is filed with the
21	Caroline Miller.	21	Eastern District of Pennsylvania it's filed on their
22	Q. The author line where?	22	ECF system; do you understand that?
23	A. In the metadata of the PDF associated	23	A. What I'm saying is is that the
24	with your complaints. Why would someone I went to	24	complaint that you forwarded to Marc Fink -- if you
25	legal advice -- why would someone I went to legal	25	look back in the record, that's what I said, not that

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1	was filed. The complaint can be filed multiple 2 places, you send it to Marc, you send it to our 3 counsel, Dave Walton, you send it to the ECF system, 4 but the original file in the original metadata of the 5 draft complaint, whether it was the EEOC or of the 6 complaint of the employment nature before you filed 7 the lawsuit, have Caroline Miller's name listed in 8 the metadata. She assisted you with drafting these 9 complaints, Mr. Carson. She violated her -- the 10 rules of professional responsibility associated with 11 an attorney because I went to her for legal advice 12 before I knew any of you or the name of Derek Smith. 13 It's really amazing that I found this out in the past 14 two weeks in preparation for this deposition today 15 and it's actually the subject of a motion for 16 disqualification in another case. It's really really 17 amazing what you guys have been able to do, you know, 18 and -- but now you've gotten caught and your 19 colleagues are lying in affidavits that they file 20 with the Court. So you'll have to excuse me if I'm a 21 little bit perturbed by this, but if it's news to 22 you, I would be happy to explain more.	1 from a complaint I forwarded to Marc Fink; is that 2 what you said? 3 A. Okay. This is what I said. There were 4 communications that took place between you and Marc 5 Fink in June of 2018. 6 Q. Okay. 7 A. There also were communications that you 8 had with Dave Walton and Cozen O'Connor, maybe Sidney 9 Gold was involved in that, I'm not sure, I believe in 10 August and September of 2018. 11 Q. Okay. 12 A. Excuse me. I have my dates wrong. 13 June of 2019, and August, September, and October of 14 2019 prior to your filing two complaints on October 15 27th, 2019, that was McNulty versus MEF and Barbounis 16 versus MEF, and then I believe you filed Yoncheck and 17 Brady a few days later, at least -- whatever the date 18 is in PACER. In at least one, if not more, of those 19 complaints, whether it was a copy of the EEOC 20 complaint that you sent to Marc Fink or a copy of a 21 draft complaint before you filed it in the ECF system 22 of PACER and all of these documents were then put 23 into a custodian and control system for discovery 24 review called Relativity, okay, so it's taken from 25 you sending it, it goes to counsel --	Page 134
23	Q. I have no clue what you're even talking about.	A. Okay. You're fine. Look, all you have	Page 135
24			Page 135
25			Page 135
1	to do is follow what's going on in the cases. 2 Q. Well, why don't you just explain -- I 3 mean, you still haven't explained -- 4 A. I just explained it to you, Mr. Carson. 5 Q. You said it's in the metadata on the 6 document that I filed with the ECF system; is that 7 what you said? 8 A. No, that's not what I said. I said -- 9 Q. Then you said it's in the metadata -- 10 A. -- I said that the document -- 11 Q. You got to -- Mr. Roman -- 12 A. Okay. Let's break it down very simply. 13 Okay? 14 Q. Well, wait -- 15 A. There is a few -- 16 Q. Mr. Roman, remember, this is a 17 question-answer. So you got to let me ask you the 18 question and then you got to say the answer -- 19 A. Ask your question, please. 20 Q. You can't jump -- 21 A. I'm sorry. I apologize for 22 interrupting you. If you would like to get a glass 23 of water, please, we can do that, we can reset in 30 24 seconds if it's too confusing for you. 25 Q. I think you said it's in the metadata	1 Q. Documents that I -- from -- that I 2 e-mailed people are on Relativity? 3 A. Of course they are. They're evidence, 4 Mr. Carson. 5 Q. Mr. Roman, there is nothing -- nothing 6 related to my e-mails ever been produced -- 7 A. No, Mr. Carson, your complaints that 8 you sent to Mr. Fink from the EEOC and your draft 9 complaints that you sent to our organization's 10 counsel prior to you filing them with the Eastern 11 District of Pennsylvania by way of the ECF system are 12 in a system that, since you probably already had 13 possession of the documents, you would know this, 14 indicate that Caroline Miller was the author of one, 15 if not more, of those documents. 16 Q. Yeah, that's -- what you're saying is -- 18 A. That's what I'm saying. 19 Q. It's just not -- 20 A. And you know what, if we want to take 21 like a few minutes here so I can prove it to you, I 22 would love to do it on the record, it will help me 23 with my motion to disqualify your firm from the other 24 case. 25 Q. I would be happy to give you a minute	Page 135

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1	if you want to show me what you're talking about.	1	MR. GOLD: More than happy to do
2	A. We can probably do that. I think it's	2	it. All right?
3	probably lunchtime now, but --	3	THE VIDEO SPECIALIST: We're off
4	Q. Do you want to take a lunch break and	4	the record. It's 2:39 p.m.
5	then --	5	(A lunch recess was taken.)
6	A. No, I'm fine talking to you about this,	6	THE VIDEO SPECIALIST: It is 3:30
7	Mr. Carson. I'm just trying to tell you what's going	7	p.m., and we are back on the record.
8	on, I'm trying to enlighten you with what's going on	8	BY MR. CARSON:
9	at your own firm, which I thought you would know	9	Q. So did you find the documents you were
10	about.	10	talking about with this metadata?
11	Q. I mean, listen, I feel like we just	11	A. I did, yes.
12	wasted 20 minutes, but that's okay I guess.	12	Q. Do you want to share the screen or put
13	A. Okay.	13	one up?
14	Q. But I would suggest to you that if	14	A. Is that okay? I mean, how do I -- do
15	there is information that you want me to look at	15	I -- Roman 3? Roman 5?
16	related to the, you know, information you just told	16	Q. I want to get through it quickly
17	me, I would be more than happy to look at it.	17	because we have a lot of other stuff to talk about,
18	A. That's great.	18	but --
19	Q. So do you want to take a break and get	19	A. Yeah, sure.
20	that or do you want to just move on? How do you want	20	Q. I mean, I'm obviously -- I can't
21	to -- it's up to you.	21	respond to it, but I guess I'll let you explain what
22	A. Mr. Carson, this is your deposition.	22	it is on the record if you want.
23	So you ask the questions, I'll give the answers.	23	A. Sure. So I'm going to share my screen.
24	MR. CARSON: Okay. Does anyone	24	Is this okay -- how do we do this? Do I, like,
25	want to take a lunch break so Mr. Roman	25	share, is it Roman 2, or do you label it, like --
	Page 137		Page 139
1	can obtain these documents and everyone	1	Q. Yeah, you can label it Roman 2.
2	can eat lunch?	2	A. Okay. So this is in PACER. Okay?
3	THE WITNESS: Well, if I look for	3	This is in a filing that's in the Meyer O'Brien
4	any of the documents, I'll probably do	4	versus MEF case, it's Exhibit --
5	it while I'm on the record. If you want	5	Q. Yeah, I've --
6	to submit an interrogatory or a request	6	A. It's Exhibit 2. Right? So the way I
7	for production of documents, you can	7	came to know about this was, we have these documents,
8	please give that to Mr. Cavalier or	8	this is between you and Lisa, and she forwarded this
9	Mr. Gold.	9	to Marnie, so I don't want to, like, to be said that
10	MR. CARSON: Okay.	10	I'm, like, trying to breach privilege or anything.
11	MR. GOLD: I assume the court	11	Okay? This is something that Lisa sent to Tricia and
12	reporter needs a break for lunch, is	12	Marnie prior to Marnie having an attorney. All
13	that what you want to take a break for	13	right? So I just want to make that clear. I'm not
14	lunch, is that it? Okay. So it's now	14	trying to do any, like, privilege funny business.
15	2:38. I mean, whatever time you need	15	Okay? And you say here, another interesting note,
16	just tell me and we'll take a break.	16	the attorney that used to run our Philly office runs
17	MR. CARSON: I mean, can you guys	17	our Miami office that's one person, that is Caroline
18	-- can Mr. Roman, like -- you know, can	18	Miller, who was listed as the attorney on the
19	you guys produce these documents that	19	administrative action from 2016 with Tiffany Miller
20	you're referring to?	20	-- sorry, Tiffany Lee. Can I, like, say scratch it
21	MR. GOLD: We'll come back after	21	on the record? I think that's only something you can
22	lunch with the documents. All right?	22	say, Mr. Carson. Sorry about that. Tiffany Lee's
23	MR. CARSON: Yeah, I'm not sure it	23	attorney in the EEOC administrative matter from 2016.
24	matters, but I'm just curious what he's	24	Now, Caroline Miller is also somebody that I sought
25	talking about.	25	legal advice from on April 23rd, 2016, at 10:42 p.m.

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1	in the evening, this is a picture from when I went 2 there, between then and sometime later that evening 3 here in Bala Cynwyd, Pennsylvania. I signed an 4 affidavit to that effect. There is a second 5 affidavit being attached to another filing which is a 6 reply to Derek Smith Law Group's response to motion 7 to disqualify, just to make sure everything is clean 8 on the record. All right? I even pulled it up in 9 PACER if you want to go through this stuff. Okay? 10 So then I went back into the discovery database of 11 the documents that had been provided either by the 12 EEOC -- like, you know that website you go into and 13 you download the filing, upload it and then it 14 becomes available to the person or the organization 15 you filed against and the person can download it or 16 counsel can download, right? So there's first -- I 17 just got to get to this. Shoot. I disconnected --	1 into this, you'll see that your letter has the name 2 in properties Derek Smith. Okay? This is the 3 metadata that I'm talking about. Tells us that you 4 created the file on June 20th, tells you that you 5 saved it and modified it on June 20th, this is when 6 you converted your word file that I'm assuming you 7 wrote this on, turned it into a -- actually you call 8 it research America Bernhardt. I don't know why you 9 would be calling us Bernhardt. Is that somebody else 10 that you filed a complaint against.	
11	MR. CARSON: I would just put an 12 objection on the record to the extent I 13 think the witness just -- or the 14 defendant just showed text message 15 communications between counsel and 16 client.	Q. Because when we do stuff, Mr. Roman, we 12 usually track --	A. Okay. Well, anyway, there's --
17	BY MR. CARSON: 18 Q. But besides that, keep going,	Q. So what that might mean is that she -- 15 nothing, just keep going.	A. Yeah, sure, I mean, whatever you -- 17 we'll be in court to talk about this probably, but 18 this is just my finding out that Caroline Miller was 19 named on a document that was on MEF four years after, 20 three years after, whatever. So she's here, says 21 Derek Smith. All right. Derek Smith, name of the 22 firm, right, maybe Derek Smith wrote it, somebody 23 else wrote -- but guess what, Derek Smith's name is 24 there on Bernhardt but it's MEF, so you guys -- 25 however your file management practices, whatever. So
26	Mr. Roman. A. I wasn't trying to do that, Mr. -- I was -- Q. I'm just preserving an objection. That's all. You can continue. A. Okay. I'm sorry. I didn't -- did I do something wrong? Q. No, you did not. A. All right. I'm not trying to, like, do any funny business. All right? Q. Yeah, you're good. A. So then you sent an e-mail to Marc Fink on June 20th, 2019, which I will call this Roman whatever -- shoot. Hold on. I'll call this Roman whatever. Okay? Whatever number you -- Q. Roman 3. A. Roman 3. I just got to share my screen. Sorry. Where is it. There you go. So this is Roman 3. This is a notice that you sent to Marc Fink by way of e-mail on June 20th -- you sent a letter and here is the complaint or people have complained about you, whatever else. This is when you tell us that you're doing the EEOC thing. Right? And then the full filing is obtained -- which is like the handwritten letter, everything else, so if you go	then when we go to the full EEOC filing, which is downloaded from the EEOC -- Q. Wait, what -- I don't understand. Like, what did you just show us with the last document? A. What did I show you? Q. Yeah. A. So here Derek Smith was involved in the drafting of this letter or at least -- Q. I'm sorry -- A. -- his metadata -- Q. -- I'm not looking at that -- you're saying that -- A. The author's name, okay, if you want to find out who the author of a document is, the only way to provide a forensic footprint of who did that document is by showing who is in the metadata. So the metadata indicates here that Derek Smith was involved in the drafting of the complaint, of the letter -- Q. Wait, wait, the complaint? A. No, not the complaint, the letter that you sent to Marc Fink on June 20th. So maybe he reviewed your work, maybe he made edits to it, maybe he put together the PDF, maybe he did a lot of	Page 143

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<p>1 things. We don't know. Only you know, Mr. Carson.      2 I don't know. But I know that Derek Smith was      3 forensically attached to this file. Okay? I'm just      4 telling you what I'm thinking here. We can get an      5 expert -- I don't know, that's not me. I'm not the      6 expert -- I'm just saying how I came to the      7 conclusion that you asked me why I thought Caroline      8 Miller helped fabricate evidence against MEF. So      9 then we get to the full EEOC filing. Okay? Call      10 this Roman 4. And this, if you're familiar with this      11 document, is Lisa Barbounis's handwritten complaint      12 against MEF, she signed it, it's got the thing here,      13 Commonwealth of Pennsylvania, and then it's your      14 letter from June 20th and the parties and statement      15 of facts --</p> <p>16 Q. I know what it is. Keep going.</p> <p>17 A. -- whatever else. So when we go to the      18 metadata from this, Caroline Miller's name shows up.      19 So why would a document you write that has Derek      20 Smith on it then be combined by a different user with      21 two separate documents, handwritten, letter,      22 statement to the EEOC, by anyone other than Seth      23 Carson. Maybe Caroline Miller was supervising you,      24 maybe she was involved in the drafting of the      25 complaint, maybe as we relate to the personal</p>	<p>1 correct?      2 A. Yes.      3 Q. In 2018.      4 A. Spoke to me many times on the phone in      5 2018.      6 Q. Relating to the allegations of sexual      7 harassment.      8 A. I think my answer on the record stands.      9 Q. Can you -- it's at least once, correct?      10 A. Yes. As I said, my record on the      11 answer stands. My answer on the record stands.      12 Q. I know, but you can't answer that. You      13 have to just answer the questions. You can't just      14 say my record stands.      15 A. Well, Mr. Carson, I've answered the      16 question already. My answer on the record stands.      17 Q. I'm reviewing it. Okay? So at least      18 once, and that one time you said he didn't speak to      19 you specifically about any specific allegations, he      20 talked to you generally and you used the language --      21 A. Is my screen off? I just want to make      22 sure that I'm -- that I'm not sharing my screen      23 anymore, am I? I'm good?      24 Q. I don't think so.      25 A. Okay. Thank you.</p>
<p>1 knowledge that you talked to your client about in a      2 text message you got advice from Caroline Miller on      3 how to file a complaint against MEF. Maybe you guys      4 worked together. I don't know. That's only between      5 the two of you. So that's how I came to that      6 conclusion, Mr. Carson. And I'm not here questioning      7 you, you're here questioning me, but if there is      8 anything else I can teach you about metadata, I would      9 love to -- there is a lot of metadata in this case.      10 I would be happy to speak about all of it at least to      11 the best of my ability. So that's why Caroline      12 Miller should be disqualified from this case, at      13 least screened, and that's why we have sought to      14 disqualify your entire firm from involvement in the      15 Meyer matter, but I'm not the lawyer here; you are.      16 You tell me about ethics.</p> <p>17 Q. All right. So we're going to move on      18 now. Thank you, Mr. Roman.</p> <p>19 A. Sure.</p> <p>20 Q. So -- all right. Let's get back to      21 something that is actually relevant to this case,      22 which is the reports of discrimination and harassment      23 in the workplace. So I think we were talking about      24 instances in 2018 when Mr. Pipes spoke with you, you      25 said he spoke to you on the phone at least once,</p>	<p>1 Q. -- and you used the language in this      2 letter as an example of the general conversation that      3 you and Mr. Pipes had, you said he kind of -- he told      4 you that there were allegations of misconduct      5 directed against you, that three women, made unwanted      6 sexual advances, but that was -- that was about the      7 extent of the conversation that you had with      8 Mr. Pipes in 2018, correct?      9 A. No, that's incorrect.      10 Q. Okay. So what else did you talk about      11 in 2018 --      12 A. It's not what else I spoke to about;      13 you have to bifurcate it. Okay?      14 Q. Just listen to the question.      15 A. Sure.      16 Q. What else did you speak to Mr. Pipes      17 about in 2018 in connection with these three women's      18 allegations of sexual harassment?      19 A. Okay. So if it's about sexual      20 harassment -- your previous question was about      21 allegations, and you gave the --      22 Q. Allegations of sexual harassment, so      23 we're specifically talking about the conversations      24 that you had with Mr. Pipes in 2018 in connection      25 with these three women's allegations of sexual</p>

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1	harassment.	1	Q. Okay. So --
2	A. Again, he generalized the	2	A. And then what he did was --
3	description --	3	Q. I understand. So did he ever have a
4	Q. That wasn't the question.	4	conversation with you where he specifically spoke to
5	A. -- saying -- I'm giving an answer.	5	you about each woman's specific allegations in 2018?
6	Q. Okay. I mean, I just said that and you	6	A. Not that I can -- I can recall a
7	said that wasn't correct, but go ahead.	7	privileged conversation I had with counsel, but I
8	A. It wasn't correct because your previous	8	cannot recall discussing the specifics, and the
9	question was what allegations. Now you're saying	9	specifics you're talking about -- you'll have to tell
10	sexual allegations, so I'm trying to really bifurcate	10	me which specific you're asking about to see if I
11	between management issues and then unproven	11	discussed it with Pipes, but I cannot recall
12	allegations of alleged unwanted sexual advances as	12	generally specific allegations beyond what I talked
13	it's quoted here in the letter.	13	about with counsel.
14	Q. Okay.	14	Q. All right. So the conversation you had
15	A. So if it's about sex --	15	with counsel, we're going to talk about that a little
16	Q. Okay. If you want to make the	16	bit. We're going to figure out what happened there.
17	distinction --	17	A. Sure.
18	A. -- general; management, very different.	18	Q. So the conversation you had with
19	Q. We're not here today to talk about	19	counsel, you're talking about house counsel Marc
20	management. We're here today to talk about	20	Fink?
21	violations of specific statutes including Title 7,	21	A. I've also had conversations with my
22	including the Pennsylvania Human Relations Act,	22	personal counsel Mr. Sidney Gold.
23	including the Philadelphia Fair Practice Ordinance,	23	Q. In 2018?
24	so let's relegate our conversation today to	24	A. I did, yes. Mr. Gold has been my
25	allegations of sexual harassment. Please explain	25	attorney for four years.
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1	what you spoke to Mr. Pipes about or was I right that	1	Q. I didn't ask you that. All right. So
2	in connection with -- in connection with the	2	in 2018 did -- well, it says here that he finished
3	conversation about sexual harassment and those	3	his investigation yesterday, and since sent it on
4	allegations your conversation with Mr. Pipes was	4	11/2 we can assume the investigation happened on
5	general and kind of relegated to what we're seeing	5	11/1, correct?
6	here in this letter; is that correct?	6	A. I don't know what happened with the
7	A. No. I will --	7	investigation. I wasn't part of it.
8	Q. Why isn't it correct? What else did	8	Q. So you didn't talk to anyone on 11/1?
9	you talk about?	9	A. I don't know if I spoke to someone on
10	A. I'll try to explain this again.	10	11/1. I would have to see my phone records. I do
11	Q. What else did you talk about?	11	remember that I spoke with counsel between October
12	A. What he said to me, from what I can	12	31st I believe, maybe it was 11/1 -- this is two
13	best recall, at least on one occasion between --	13	years ago, Mr. Carson, long time ago.
14	Q. That's all you can testify to is what	14	Q. Right.
15	you can best recall, Mr. Pipes. Mr. --	15	A. And with the -- by the time I got
16	A. Right, that's why I'm saying as best as	16	this -- I'll give you an example. Lisa Barbounis
17	I can recall so the written record reflects what I'm	17	called me.
18	saying. As best as I can recall, from November 2nd,	18	Q. I don't need an example.
19	2018, until the end of 2018 there was at least one	19	A. No, you're asking me if I talked with
20	discussion that Mr. Pipes and I had where he said in	20	anybody. I spoke with --
21	a general manner, Mr. Roman -- calls me Gregg,	21	Q. I'm asking you --
22	whatever you want to go by -- these women have made	22	A. -- Lisa Barbounis.
23	sexual -- accusations against you that you have made	23	Q. I'm not asking if you talked to anyone
24	unwanted sexual advances towards them and this is	24	in the world. I'm asking whether you talked to
25	what we are going to do about it.	25	anyone related to the instant investigation whereas

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1	-- so I'm asking if you had any conversations with	1	factual evidence speaks for itself.
2	anyone where you gave your side of the story on	2	Q. Well, did you acknowledge that? Is
3	11/1/2018.	3	that true?
4	A. I don't know if it's 11/1, but maybe	4	A. Well, I didn't acknowledge that I had
5	11/2.	5	unacceptable conduct. What I acknowledged was that
6	Q. Sorry?	6	Mr. Pipes was in a difficult position because of the
7	A. I don't know on 11/1 or 11/2, but I did	7	allegations that were made against me.
8	have a conversation with someone about these	8	Q. So this statement is not true then.
9	allegations, general allegations, on 11/1 or 11/2.	9	You didn't do that.
10	Q. I'm asking you specifically, though,	10	A. Well, let's go over it again. But you
11	the -- so you understand --	11	acknowledge that your conduct, whatever your
12	A. Specifically 11/1? I can't answer you,	12	intentions were, was not acceptable and put these
13	Mr. Carson. I don't remember.	13	employees in a difficult position. No, again, my
14	Q. Is that Marc Fink that you spoke to?	14	conduct, according to the way that these three
15	A. I had a conversation with Marc Fink,	15	employees, Lisa Barbounis, Tricia McNulty, and Marnie
16	in-house counsel, between October 31st and November	16	Meyer O'Brien or O'Brien Meyer, whatever, said put
17	2nd. I don't know which exact day.	17	Pipes in a difficult position, and if there was
18	Q. And did he talk to you about the	18	anything that they alleged I do -- if I smiled the
19	specific -- I don't want to know what he said, but is	19	wrong way, if I looked up, if I looked over, and they
20	that when you got into the specific allegations?	20	said that they thought it was unwelcoming and they
21	A. Well, I need to ask counsel if I can	21	went to him to complain, what am I going to say, I'm
22	answer that question.	22	the manager of the organization and, you know what --
23	MR. CARSON: Can he answer?	23	hold on, you know what, it's a smile, it's something
24	MR. GOLD: Conversation with Marc	24	else -- I wasn't part of the investigation. If
25	Fink, yeah, direct you not to answer the	25	they're saying I did something and now the president
1	question.	1	of the organization is impacted by it, doesn't matter
2	MR. CARSON: I'm not asking what	2	what I think. He's affected by it.
3	he said, Mr. Gold. I'm just asking if	3	Q. Mr. Roman --
4	that's -- if that was when he talked	4	A. That's the way that it works.
5	more specifically about the case.	5	Q. Mr. Roman, did you acknowledge that
6	MR. GOLD: Can you read back the	6	your conduct was not acceptable?
7	question?	7	A. No, I don't know what conduct you're
8	(The following was read back by	8	talking about, Mr. Carson. It's a general question.
9	the court reporter:	9	Q. Then the letter is wrong then. Then
10	Question, "And did he talk to you	10	the letter is wrong, correct?
11	about the specific -- I don't	11	A. It's not that the letter is wrong.
12	want to know what he said. Is	12	Q. Well, it --
13	that when you got into the	13	A. The characterization --
14	specific allegations?"	14	Q. -- it says that you acknowledge that,
15	MR. GOLD: I don't understand the	15	right?
16	question.	16	A. No, what I'm saying is is that I
17	MR. CARSON: Okay. I'll rephrase	17	acknowledged in many conversations both then and
18	it.	18	afterwards that management practices that I was privy
19	BY MR. CARSON:	19	to and decisions that I made, not of a sexual nature,
20	Q. So you told -- so Mr. Pipes says that	20	but a general management nature, were wrong --
21	you told somebody that you felt -- that -- that you	21	Q. Okay. Did you ever --
22	acknowledge your conduct, whatever your intentions,	22	A. -- but I never had any --
23	was not acceptable and put these employees in a	23	Q. -- send a letter back to Daniel Pipes
24	difficult position, correct?	24	and explain to him that --
25	A. That's what the letter -- I think the	25	THE COURT REPORTER: I can't hear

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<p>1       you. Start the question over, please.</p> <p>2 BY MR. CARSON:</p> <p>3       Q. Did you respond to this letter and let</p> <p>4 Mr. Pipes know that this -- that the wording is off,</p> <p>5 because the wording says that you're acknowledging</p> <p>6 that -- I mean, look what it says. It says --</p> <p>7       A. Yeah, yeah, I see, I see --</p> <p>8       Q. It says you acknowledge that your --</p> <p>9       A. -- what it says.</p> <p>10      Q. Let me finish the question. It says</p> <p>11 you acknowledge that your conduct, whatever your</p> <p>12 intentions, was not acceptable. So I'm asking you,</p> <p>13 did you contact Mr. Pipes and tell him I don't agree</p> <p>14 with this letter?</p> <p>15      A. No, I didn't contact Mr. Pipes and tell</p> <p>16 him I disagree with the letter. I think that I had a</p> <p>17 response --</p> <p>18      Q. Did you -- did you --</p> <p>19      A. -- to the letter.</p> <p>20      Q. Did you -- do you agree with the second</p> <p>21 part, do you agree that your conduct put Lisa,</p> <p>22 Tricia, and Marnie in a difficult position?</p> <p>23      A. No, because there wasn't any conduct to</p> <p>24 put them in a difficult position. Look, Mr. Carson,</p> <p>25 you're trying to explain --</p>	<p>1 sentence; is that fair to say?</p> <p>2       A. No, it's not that I disagree with the</p> <p>3 sentence. I disagree with your characterization of</p> <p>4 the sentence.</p> <p>5       Q. Well, you think this sentence doesn't</p> <p>6 say that you put Lisa -- that you're acknowledging</p> <p>7 that you put Lisa, Tricia, and Marnie in a difficult</p> <p>8 position?</p> <p>9       A. May I ask you for the license to</p> <p>10 explain the paragraph so that you have the context of</p> <p>11 the sentence.</p> <p>12      Q. Well, let me just read it to you. Here</p> <p>13 is what I found. This is Dr. Pipes -- this is what</p> <p>14 Dr. Pipes is saying. He's "I", right?</p> <p>15      A. Okay. Before --</p> <p>16      Q. The "I" is Dr. Pipes.</p> <p>17      A. Before we get to you reading --</p> <p>18      Q. Just let me finish the question. The</p> <p>19 "I" is Dr. Pipes.</p> <p>20      A. I just want to ask you -- I want to ask</p> <p>21 you for clarity on something from your previous</p> <p>22 question.</p> <p>23      Q. Well --</p> <p>24      A. You'll read the sentence, okay, and if</p> <p>25 I can say, Mr. Carson, stop, and I'll explain what I</p>
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<p>1       Q. So you don't --</p> <p>2       A. I'm trying to give you --</p> <p>3       Q. So you don't agree with this --</p> <p>4       A. I'm trying to give you --</p> <p>5       THE COURT REPORTER: Excuse me.</p> <p>6       Please.</p> <p>7 BY MR. CARSON:</p> <p>8       Q. I know, but, Mr. Roman, just --</p> <p>9       THE COURT REPORTER: One at a</p> <p>10 time. Please.</p> <p>11 BY MR. CARSON:</p> <p>12      Q. -- answer the questions that I'm asking</p> <p>13 and let's just keep it moving so we can get out of</p> <p>14 here, man, it's Friday. So, like --</p> <p>15      A. I've got all night, Mr. Carson.</p> <p>16      Q. Yeah, I do, too, but, you know what I</p> <p>17 mean, we don't have to be here all night if we don't</p> <p>18 need to be.</p> <p>19      A. I'm trying to explain myself.</p> <p>20      Q. Mr. Roman, I promise, I'll give you the</p> <p>21 opportunity to answer -- put whatever information you</p> <p>22 want on the record before this is over, but --</p> <p>23      A. Okay.</p> <p>24      Q. It says here -- so the whole sentence</p> <p>25 you're -- you just -- you disagree with this</p>	<p>1 see as my interpretation of Mr. Pipes's words. Is</p> <p>2 that fair?</p> <p>3       Q. Do you agree, Mr. Roman, that the "I"</p> <p>4 here is Mr. Pipes?</p> <p>5       A. I do.</p> <p>6       Q. Okay. So here Dr. Pipes is saying here</p> <p>7 is what I found. Three women who work for you, Lisa,</p> <p>8 Tricia, and Marnie, say that you made unwanted sexual</p> <p>9 advances toward them. You maintain that you never</p> <p>10 made such advances and did not know they felt</p> <p>11 uncomfortable. But you acknowledge that your</p> <p>12 conduct, whatever your intentions were, was not</p> <p>13 acceptable and put these employees in a difficult</p> <p>14 position.</p> <p>15      So I'm just asking, do you agree with</p> <p>16 this paragraph or do you disagree with this</p> <p>17 paragraph?</p> <p>18      A. No, I disagree with this paragraph.</p> <p>19      Q. Okay. Would you like -- I'll give you</p> <p>20 the opportunity because I told you to, would you like</p> <p>21 to explain why?</p> <p>22      A. Yeah. Sure. Thank you very much. All</p> <p>23 right. So we have to go back to the previous</p> <p>24 paragraph to understand this paragraph.</p> <p>25      Q. Go ahead.</p>

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<p>1        A. As you know, there have been several      2 allegations of improper conduct directed against you.      3 Right? So we said beforehand earlier in the      4 deposition several allegations. Some say there was      5 sexual allegations, other are business professional      6 management organizations. Okay? Allegations.      7        The Middle East Forum takes these      8 allegations very seriously. Mr. Pipes is taking both      9 the allegations of a sexual nature and the      10 allegations of a nonsexual matter seriously.      11      Accordingly, I investigated this matter      12 yesterday, immediately upon learning of it. And we      13 heard in Mr. Pipes's testimony that he said that he      14 spoke with each employee in each of their offices. I      15 don't know what was said, I wasn't there, I was I      16 think traveling back to Philadelphia or something,      17 but he investigated with those employees. Okay?      18      Then it says here is what I found.      19 What he's saying is he found from his conversations      20 with those employees, maybe counsel was involved, I      21 don't know, three women who work for you, da da da da      22 da, say they -- unwanted -- that's the first      23 sentence. Second sentence, apologies. And what I am      24 saying is this. After these allegations both of a      25 managerial and of a sexual nature were made against</p>	<p>1 your intentions were, was not acceptable and put      2 these employees in a difficult position. What he      3 means by that sentence I'll never know, but my      4 interpretation of that sentence is the fact that he      5 has said that I acted like a drill sergeant, he said      6 that I asked people to work too late, he said that I      7 gave people too much work, he said that I should have      8 been nicer, and he never said that I wasn't nice to      9 female employees and he never said that I made sexual      10 advances beyond what's in this letter and there is      11 very very long documentation over three years where      12 he believes that I was too tough of a boss, that he      13 thinks that I took the way that I was when I was a      14 commander in the Israel defense forces and then I      15 went back into civilian life and tried to be somewhat      16 of a -- I don't know what the word would be, more of      17 like a disciplinarian than I would be someone a boss,      18 and whatever it was, however I spoke to employees,      19 like I said, could have smiled, could have said      20 hello, whatever it was, nothing was ever of a sexual      21 nature, Mr. Carson. It was always just because they      22 probably thought that I was too tough. And if you      23 look at the text messages and every other      24 communication from all of the clients you've      25 represented, Ms. Shikunov's clients, and specifically</p>
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<p>1 me, Marc Fink, in-house counsel, was charged with      2 investigating somewhat as -- I guess you would call      3 it as the detective, as in-house counsel, corporate      4 counsel, whatever you want -- of taking the      5 complaints that the women made to Mr. Pipes that then      6 Pipes conveyed to Fink, and this is probably privy, I      7 don't know about the conversations there, that's a      8 privileged conversation, and Fink went ahead and      9 talked to me. The contents of that conversation I      10 understand are either privileged or work product, I      11 don't know the proper classification. I'll defer to      12 counsel on that. Then what Pipes is doing is just      13 saying you maintain that you never made such advances      14 and did not know they felt uncomfortable. He's      15 saying what I believe I conveyed to counsel in a      16 privileged conversation. So whatever that conclusion      17 he's making there that he addresses to me, that's his      18 words, not mine. Okay? I never talked to Pipes      19 about this directly with specifics. I talked to      20 counsel, didn't talk to Pipes. So I can't comment on      21 what Daniel Pipes is thinking. I'm not Daniel Pipes.      22        Then the concluding sentence here,      23 which goes back to the first sentence where he says      24 several allegations, both professional and sexual, he      25 says but you acknowledge that your conduct, whatever</p>	<p>1 the men who work and worked at the Middle East Forum,      2 all say that I was too hard, and I learned from that,      3 I learned from that, I try to be a much nicer person      4 these days, I've done a lot of work on trying to      5 improve my management style, and even today I'm still      6 bound by the restrictions that Mr. Pipes -- some of      7 the restrictions that Mr. Pipes put on me in that      8 letter that you showed previously of what I'm allowed      9 and what I'm not allowed to do at the Middle East      10 Forum. That's what I meant by that.      11      Q. What about the next sentence?      12      A. What?      13      Q. What about the next sentence? You put      14 this in the context of calling yourself a social      15 junkie. What did you mean by that?      16      A. Well, I don't think I ever called      17 myself a social junkie. I don't remember saying      18 that.      19      Q. So you didn't say that you were a      20 social junkie who seeks constant social interaction?      21      A. I don't remember ever saying that, and      22 if I did say it, I don't know how he's taking it      23 because I didn't talk to him about it, I talked to      24 Mr. Fink.      25      Q. Well, you did receive this letter,</p>

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1	though, right?	1	it might be hard to do that?
2	A. It looks like I received it. It's	2	A. Do what?
3	addressed to me, it's copied to Marc Fink.	3	Q. For a woman to report information that
4	Q. And you read it in November 2nd, 2018,	4	has a personal sexual context to it.
5	so why didn't you respond and correct Mr. Pipes?	5	A. Mr. Carson, I can and I can relate to
6	A. Mr. Carson, it was like an avalanche	6	that on a personal level.
7	coming down a mountain. Everyone who I considered to	7	Q. Going back to the AIPAC conference, can
8	be my friend and my associate all of a sudden came	8	you please explain what that is, briefly?
9	out overnight after months of interactions, birthday	9	A. What's what?
10	parties, going out with social events, travel,	10	Q. What is the AIPAC conference? Is that
11	whatever else, not one complaint was ever registered	11	an annual conference held in Washington D.C.?
12	to me between the time any of your clients started	12	A. Well, there's a few AIPAC conferences
13	working with MEF about me -- it was all about each	13	that take place.
14	other and them. I had to mediate between Marnie and	14	Q. Well, in 2018 --
15	Lisa, Marnie and Tricia, between Delaney and Matt,	15	A. Some take place --
16	Matt and Tricia, there was all these interpersonal	16	Q. In 2018 the Middle East Forum attended
17	conflicts, and it's all reflected on the record, by	17	an AIPAC conference sometime around March; is that
18	the way, by all the discovery that you gave to the	18	correct?
19	Middle East Forum. I have so much more knowledge now	19	A. There was the American Israel Public
20	understanding the interpersonal dynamics of your	20	Affairs policy conference that took place between
21	clients and how they hated each other before November	21	March 3rd and March 6th or March 2nd and March 5th,
22	2nd, 2018. And then when all this is coming at you,	22	if that's what you're referring to, yes.
23	this wave of complaints that are addressing you, at	23	Q. Yeah, I'm going to try to get us
24	least the way I reacted was sort of fight or flight.	24	through this quickly. So the AIPAC conference in
25	Mr. Pipes, look, I just --	25	March of 2018, did you attend that along with Matt
1	Q. Did you --	1	Bennett and Patricia McNulty and Lisa Barbounis and
2	A. -- want to -- hold on. Hold on. Hold	2	Marnie Meyer?
3	on. Mr. Pipes, look, I've got a job, I've got three	3	A. Yes, and there was other people who
4	kids that I have to worry about, I have to pay my	4	attended with us as well.
5	rent, I got to do things -- whatever you're saying,	5	Q. Understood. And you -- it's my
6	there will be a time to address the veracity and the	6	understanding that you and Matt Bennett booked the
7	truthfulness and the honesty of what these people are	7	Airbnb; is that right?
8	saying about me, but right now I'm going to work with	8	A. I actually think it was Lisa that
9	you to try to make this problem mitigate itself and	9	booked the Airbnb.
10	I'll do whatever you need me to do, and I even	10	Q. For you and Matt Bennett, correct?
11	offered my resignation, Mr. Carson, if that's what	11	A. Yes, and she also booked her own hotel
12	you need me to do, and the conclusion at the end of	12	room for her and Tricia and for Marnie after Tricia
13	the day when all this was over is that I was to go	13	asked if Lisa and Marnie could go.
14	and start my own organization until Lisa Barbounis	14	Q. Okay. And I believe that you went to
15	went back on her word, reneged on her complaints, and	15	the AIPAC conference over the -- over a weekend in
16	said I should come back to work with her as if though	16	March; is that right?
17	nothing ever happened. That's what happened,	17	A. Well, you would have to tell me when it
18	Mr. Carson.	18	is, but usually it's Saturday -- or Friday to Tuesday
19	Q. Do you -- do you understand why women	19	depending on the year.
20	might come -- not come forward and report sexual	20	Q. And that first Friday during that AIPAC
21	harassment the day it happens?	21	conference did the -- during that first AIPAC
22	A. Mr. Carson, I'm not those women, so I	22	conference in March of 2018 did the Middle East Forum
23	can't comment on something that someone else might	23	hold an event?
24	think.	24	A. No.
25	Q. Well, can you think of any reasons why	25	Q. A dinner?

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1	A. No.	1	not the others.
2	Q. Is that Saturday?	2	Q. Well, you were Lisa's and Patricia
3	A. I don't think so, no.	3	McNulty's, too --
4	Q. Did the Middle East Forum sponsor or	4	A. Yeah, but my understanding is you were
5	hold a dinner for donors during that conference?	5	asking about who managed Tricia McNulty, so I was
6	A. Not at the conference; in parallel to	6	answering that question.
7	the conference.	7	Q. Okay. So if we put it in a hierarchy,
8	Q. Okay. Where was that dinner held, do	8	you and then Matt Bennett and then Ms. McNulty,
9	you remember?	9	correct?
10	A. In Chinatown Gallery Place at a	10	A. Yeah, but, again, McNulty reported to
11	restaurant called Cuba Libre.	11	other people besides me and Bennett.
12	Q. The -- that dinner, it was a dinner	12	Q. Okay. So the night that that dinner
13	that Ms. McNulty helped organize; is that correct?	13	was held, at the end of the night tell me where you
14	A. The donor dinner, yes, she organized it	14	guys went.
15	with Matt Bennett.	15	A. So Tricia McNulty had just been on a
16	Q. And that was part of her job as the --	16	cruise I think. She was on vacation -- yeah, it was
17	working with Matt Bennett who at the time Matt	17	really crazy because we had asked her to schedule the
18	Bennett was the director of development, correct?	18	entire dinner before she went on vacation, and there
19	A. Correct.	19	was an e-mail that went from Tricia to me, which I
20	Q. And Ms. McNulty was sort of -- reported	20	think was sent like February 23rd, February 24th, I
21	to Matt Bennett at that time; is that correct?	21	forget the exact date she was on vacation, but she
22	A. What do you mean reported to?	22	sent me an e-mail before vacation and she said here
23	Q. He was her boss.	23	is all the plans, here is everything else, and I said
24	A. Yeah, well, she really had sort of four	24	to her who is going to manage this, and she said,
25	people that she was involved with. She worked with	25	well, I will, but I need more people, and I said what
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1	Daniel Pipes, she worked with Matt Bennett, she	1	more people do you need, and she said, well, what
2	worked with Marnie Meyer -- well, actually five	2	about Marnie and Lisa, and I said, okay, you make the
3	people. Marnie Meyer, myself. And then she also had	3	decision what's best for you. I really believed in
4	the responsibility of liaising with the different	4	having people decide what's best for them,
5	volunteers and the different hosts of events, so she	5	self-empowerment. And I said if it's just you, get a
6	sort of like was a board liaison, too. So if you	6	hotel; if it's you and Marnie and Lisa, get an
7	want to consider that a direct report, I don't know	7	Airbnb. Not my Airbnb; that was just me and Matt.
8	about the management structure -- but it was pretty	8	Okay? And then she booked her hotel, I think -- I
9	informal.	9	told her to stay at the Hilton, we had a good deal
10	Q. You were their -- all their boss,	10	there, so she had her own hotel, that was her
11	though, correct?	11	accommodations and lodging, she was supposed to stay
12	A. No, I was not.	12	with Marnie and Lisa, they had agreed to stay
13	Q. You were not Matt Bennett's boss?	13	together for some reason. I said if you need more
14	A. No, I was.	14	than one, go ahead. And then we arrived in D.C. -- I
15	Q. You were not Marnie Meyer's boss?	15	was in meetings all day. Can I ask you a question,
16	A. No, I was.	16	Mr. Carson, just about specifics? Has MEF provided
17	Q. In March of 2018.	17	you or has my counsel provided you with the calendar
18	A. I was, yes.	18	from 2018?
19	Q. You were Lisa Barbounis's boss?	19	Q. I don't know. But --
20	A. Yes, but I didn't mention her.	20	A. The reason it matters is because that
21	Q. By boss I mean supervisor, boss, same	21	calendar was arranged by Tricia McNulty.
22	thing.	22	Q. Okay.
23	A. Yeah, but, like I said, I didn't	23	A. So I don't want to give you an answer
24	mention her, so you asked me if I was all of their	24	that is like, well, you know, we were supposed to go
25	bosses, and I was Marnie and I was Matt's boss but	25	here and then it turns out I was somewhere else. I'm

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1	trying to give it to you best of my recollection.	1	Q. Okay.
2	Q. Let me fast forward this a little bit.	2	A. But I do remember --
3	At the end of the night did --	3	Q. Is it possible --
4	A. All this is important because it gives	4	A. -- that I had -- I don't know if it's
5	context to what was planned.	5	possible or not. I don't want to answer something
6	Q. I understand. I understand. But let	6	that's not accurate.
7	me just --	7	Q. Well, is it possible that you took the
8	A. So --	8	same Uber or do you specifically recall that you
9	Q. So at the end of the night did you and	9	didn't?
10	Matt Bennett and Ms. McNulty and Ms. Meyer and Ms.	10	A. No, I don't remember who I took an Uber
11	Barbounis return to the Airbnb that you and Matt had	11	with, Mr. Carson.
12	booked?	12	Q. Okay. So now you're all back at the
13	A. No, because there was other events	13	Airbnb. What time is it when you get there?
14	between the dinner and the end of the night.	14	A. I think the Uber records indicate --
15	Q. Yeah, I -- at the end of the night I	15	you have to see, but the bars -- see, what happened
16	said.	16	-- that's why I wanted to mention beforehand, that --
17	A. Well, not at the end of the night. At	17	after the dinner and then after, Marnie Meyer and
18	the end of the night Tricia McNulty slept in the	18	Lisa and Tricia had booked our attendance at four or
19	Airbnb, but we didn't immediately go back to the	19	five events that took place after the dinner. I have
20	Airbnb.	20	an e-mail, and we can provide this if this is
21	Q. I know. I understand. I'm not worried	21	something that will help, Lisa Barbounis and Tricia
22	about where you guys went and had a couple drinks in	22	McNulty were exchanging e-mails with EJ Kimball, who
23	between dinner and Airbnb, I'm trying --	23	used to work for MEF, where Lisa asks EJ what's this
24	A. It wasn't a couple drinks, Mr. Carson.	24	event CAMERA, Committee for Accurate Middle East
25	Tricia McNulty was drunk beyond belief.	25	Reporting in America, and EJ says I don't know but
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1	Q. Okay. Now, at the end of the night	1	they have top shelf liquor, I'll be there, and then
2	when you allege that she was drunk beyond belief did	2	Lisa responds count me in. And there is another
3	you all return to the Airbnb that you and Mr. Bennett	3	e-mail which talks about --
4	had booked?	4	Q. Mr. Bennett, you can -- you and your
5	A. No, Matt -- Matt and I had, I think, we	5	counsel can submit whatever documents you want and --
6	went to get pizza, they were waiting outside the	6	A. I'm Mr. Roman, not Mr. Bennett.
7	entrance, or we may have been in the same car, I'm	7	Q. Sorry. Mr. Roman. Thank you.
8	not sure, I think probably Lisa has the Uber records	8	A. But the reason I'm saying all this is
9	or they might be somewhere, but there was different	9	important is because the way in which they returned,
10	times that different people showed up to the Airbnb	10	some people were at the hotels and were at the bars,
11	because there was multiple rides.	11	other people were at the Airbnb, and at the end there
12	Q. But you and Lisa --	12	were so many people at the Airbnb I don't remember
13	A. So I -- I don't remember if I arrived	13	who was there and when they were there but I do
14	with those three and Bennett. I do remember that I	14	remember --
15	was with, like, seven other people who were there and	15	Q. I just want to know what time you got
16	they stayed -- few of them stayed there until the	16	back, what time --
17	next day, too. So it wasn't just the four of them.	17	A. I can't give you an accurate time.
18	Q. But then you guys all did go back to	18	Q. Approximately.
19	your place at the Airbnb, right?	19	A. It was after the -- after that we were
20	A. At different times, staggered.	20	at three or four or five bars -- we were at some bars
21	Q. But you and Lisa and Mr. Bennett and	21	together, we were at some bars that we separated --
22	Ms. McNulty all took the same Uber back to it,	22	Q. Was it around 2 in the morning?
23	correct?	23	A. -- it was really mix.
24	A. I don't remember if we were in the same	24	THE COURT REPORTER: I can't hear
25	Uber.	25	you when you're talking at the same

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1	time. Please.	1 you order some pizza into the room or did you go get
2	BY MR. CARSON:	2 pizza on the way back there? How did that happen?
3	Q. Was it around 2 in the morning?	3 A. Raheem Kassam ordered pizza.
4	A. I don't know.	4 Q. Okay. And were you sitting on the
5	Q. Okay. Fine. So now you're back at the	5 couch next to Lisa Barbounis and Patricia McNulty?
6	Airbnb. You're there, Matt Bennett is there,	6 A. When?
7	correct?	7 Q. When you got back to the Airbnb.
8	A. In addition to about eight other	8 A. No, I don't think so.
9	people, yes.	9 Q. At no time did you sit on the couch
10	Q. Is Lisa Barbounis one of those eight	10 with them.
11	people?	11 A. I may have, but the exact time you're
12	A. Yeah, I believe she was there.	12 asking me if I did, I had conversations with the
13	Q. And Patricia McNulty is one of those	13 students, I played the game of Battleship with them
14	eight people?	14 -- we actually got this box of Battleship from one of
15	A. I believe she was there, yeah, she	15 the bars which was one of these board game bars,
16	slept there that night.	16 brought it back to the condo, whatever it was, and I
17	Q. Marnie Meyer is one of those eight	17 remember that some people were taking pictures
18	people?	18 because the view was over Logan -- not Logan --
19	A. She also slept there.	19 anyways, one of the circles on Massachusetts Avenue,
20	Q. Was there someone named Raheem Kassam?	20 and then we were playing a game of Battleship, you
21	A. Yeah, Raheem was there.	21 know, the board game Battleship, at the dining room
22	Q. Was there some people from Pinsker	22 table, and the entire room was this, like, purple
23	there?	23 couch that extended like this, like an oval. The TV
24	A. Can you be more specific?	24 was to the left. There was a table for chess that
25	Q. No. I don't know how to be. Were	25 came around. There was a dining room table which
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1	there Pinsker people there?	1 divided -- there was no walls, but it divided the
2	A. Yes. Would you like the names of the	2 kitchen area from the living room, but everything was
3	people who were there?	3 all together. So I had this very intense game of
4	Q. If you know their names, you're welcome	4 Battleship against Elliot Miller, and -- I don't even
5	to say them for the record.	5 know where he is these days, but that's what I
6	A. Sure. Elliot Miller, Jonathan Hunter,	6 remember. And then I also remember rolling
7	a guy named Ryan, I don't remember his last name,	7 cigarettes because the Brits, they don't know how to
8	Yosef or Yusef, guy named Steve Shimel [ph] was	8 roll cigarettes, they're -- I don't smoke anymore,
9	there. I want to say -- there was two or three	9 but doesn't matter. And then I was rolling the
10	others, they go to Oxford and Cambridge, okay,	10 cigarettes and I would go outside to the balcony --
11	they're students, that are involved with this	11 it was cold, man. It was really cold. That's what I
12	organization called the Pinsker Centre, but there was	12 remember. And then there was a point where it was
13	-- must have been at least 14 or 15 people there.	13 getting late, I said everybody's got to go, we're
14	Q. And you started smoking marijuana?	14 going to sleep -- because at AIPAC I had a meeting at
15	A. No, I smoked cigarettes at that time.	15 8 a.m. the next day --
16	Q. Do you smoke marijuana?	16 Q. Did you whisper that in Ms. McNulty's
17	A. Now, no.	17 ear?
18	Q. Knowing that there is nothing wrong	18 A. Did I whisper what -- I didn't whisper
19	with it because it just got legalized in New Jersey	19 anything. I don't whisper.
20	and legalized in 15 other states?	20 Q. That everyone had to go?
21	A. No, you asked me if I smoke marijuana	21 A. I'm a pretty --
22	now. I said no.	22 THE COURT REPORTER: I can't hear
23	Q. At that time did you?	23 you. I can't hear you. Can you repeat
24	A. I have smoked marijuana in the past.	24 that question?
25	Q. So now you're all back, I think -- did	25 BY MR. CARSON:

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<p>1 Q. Did you whisper that in Ms. McNulty's 2 ear?</p> <p>3 A. No, Mr. Carson, I don't whisper, I'm 4 always told -- one of the complaints that Mr. Pipes 5 said is that I'm too loud.</p> <p>6 Q. So you --</p> <p>7 A. So I don't -- I don't whisper into 8 people's ears, no.</p> <p>9 Q. Did you yell into her ear then?</p> <p>10 A. No, I -- that would not be nice if I 11 yelled in someone's ear. I don't yell in people's 12 ear.</p> <p>13 Q. Did you tell her that everyone should 14 go, it should just be the two of you there?</p> <p>15 A. No, I never said that.</p> <p>16 Q. Did you pick her up by her butt and put 17 her on your lap?</p> <p>18 A. No, I've never touched Ms. McNulty in 19 such a fashion. I've actually never probably ever 20 touched Ms. McNulty, so that accusation is 21 outlandish.</p> <p>22 Q. Well, she made the accusation against 23 you. Is she lying?</p> <p>24 A. Mr. Carson, Tricia McNulty has made 25 seven different versions of an allegation of some</p>	<p>1 you saying they're lying about?</p> <p>2 THE COURT REPORTER: I can't hear 3 your questions because you're talking at 4 the same time that he is. Please repeat 5 it.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. My question is, so are they both lying 8 then?</p> <p>9 A. What are you talking about? What are 10 they -- what are you saying they're lying about?</p> <p>11 Q. Ms. Barbounis and Ms. McNulty have 12 consistently alleged since November of 2018 that you 13 were on the couch between them, that you put your arm 14 around Ms. Barbounis, that you put your other arm 15 around Ms. McNulty, you pulled them both toward you, 16 that Ms. McNulty -- you picked her up by her butt and 17 put her on your lap and started whispering in her ear 18 that everyone should leave and it should just be the 19 two of you in the room. They both allege that. Are 20 they both lying?</p> <p>21 A. Mr. Carson --</p> <p>22 Q. Yes or no.</p> <p>23 A. -- first of all -- first of all, what 24 you're alleging has been told in this case, in 25 multiple cases, seven different ways.</p>
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<p>1 nature which started one way when you sent the letter 2 to us on June 20th and it morphed into this story on 3 and on and on to this day that she -- not this day, 4 but that she gave another version some -- two weeks 5 ago she testified. Ms. McNulty is lying, there is no 6 other word to say it, when she says that I in one way 7 or another may have touched her on some couch that I 8 don't remember even sitting on. So, yes, she's 9 lying.</p> <p>10 Q. Well, is Ms. Barbounis lying, too, 11 then?</p> <p>12 A. Ms. Barbounis is a whole other case of 13 lying. Ms. Barbounis --</p> <p>14 Q. Well, she said --</p> <p>15 A. -- according to --</p> <p>16 Q. -- that she saw you on the couch next 17 to Ms. McNulty and she said --</p> <p>18 A. Ms. Barbounis says a lot of things. I 19 can't testify to the veracity of what Ms. Barbounis 20 sees. She sees a lot of things that have already 21 been disproven, Mr. Carson, so, no --</p> <p>22 Q. So they're --</p> <p>23 A. -- I don't --</p> <p>24 Q. So they're both lying.</p> <p>25 A. Well, what are they lying -- what are</p>	<p>1 Q. Okay.</p> <p>2 A. So that's the first thing. So if you 3 want to address each allegation how it's changed 4 seven times --</p> <p>5 Q. Yeah --</p> <p>6 A. That's one thing.</p> <p>7 Q. -- I would be happy to do that, but can 8 you just answer the question?</p> <p>9 A. Sure. But the answer to those --</p> <p>10 Q. Were they lying?</p> <p>11 A. -- seven different stories is they 12 lied, they lied, they lied, they lied, they lied, 13 they lied, they lied, seven times. Yes, they lied.</p> <p>14 Q. So what -- so tell me these seven 15 different stories. When did you hear the first one?</p> <p>16 A. Well, it's not that I have to see them, 17 it's we have to go through the complaints. You filed 18 four complaints, in Yonchek, in Brady, in Barbounis 19 --</p> <p>20 Q. We're only here today to talk about one 21 case.</p> <p>22 A. No, but you're asking about the lies. 23 You tell the story a different way in each of your 24 complaints. We have to address each lie if you would like to really get into the specificity of it.</p>

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1	Q. I think -- Mr. Roman --	1 Q. So -- and you testified that that story
2	A. So you say it one --	2 has morphed and that there has been --
3	Q. Just slow down --	3 A. Oh yeah.
4	A. I'm just trying to answer your	4 Q. -- eight versions of the story, so --
5	question, Mr. Carson. I'm sorry. I won't answer if	5 A. Seven versions, not eight. Seven.
6	you don't want me to.	6 Q. Seven. And so the first -- and you
7	Q. I'm going to give you an opportunity to	7 don't -- I'm not going to hold you to the number.
8	explain yourself. Slow down for a second.	8 A. I think it's seven. It might be eight,
9	You testified that -- from when until	9 it might be six.
10	when has the story morphed. Give me the first date	10 Q. Approximately. So --
11	of the -- the date of the first story and give me the	11 A. Sevenish or so.
12	date of the last story and then we'll fill in the	12 Q. -- the first -- the first one that
13	blanks once we have a date range that we can talk	13 you're aware of occurred around October of 2018; is
14	about. So please --	14 that right?
15	A. Sure.	15 A. No, I said when Lisa Barbounis revealed
16	Q. -- give me the date the first story was	16 that she had started an affair with Danny Tommo to
17	alleged.	17 Tricia McNulty, that's the first time.
18	A. So I wasn't there when the first story	18 Q. The first time --
19	was told, so I can't tell you the exact --	19 A. I think it was October --
20	Q. Approximate date.	20 Q. -- that you heard the story.
21	A. -- date. So I think there was text	21 A. -- 23rd or 24th -- I didn't hear her
22	messages between Lisa and Tricia from around the time	22 story; that's after reviewing the litigation and all
23	that Lisa started her relationship with Danny Tommo,	23 of the discovery that you produced, that's when it
24	October 23rd, 2018, and they start talking about a	24 starts making sense of this lie.
25	Gregg plan, which Lisa Barbounis acknowledged in her	25 Q. That's not what I'm -- that's not what
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1	testimony given at her deposition last week --	1 I'm asking you. I'm -- you said that the story of
2	Q. That's not what --	2 how they described the incident has morphed seven
3	A. -- or two weeks ago -- I'm getting to	3 times around.
4	this. Because what they're doing is --	4 A. Correct.
5	Q. That's not what we're talking about.	5 Q. So I'm wondering when the first version
6	I'm --	6 of the story was told. Is that around --
7	A. Mr. Carson, you're asking me when the	7 A. The first --
8	lies started. I'm trying to give you the context.	8 Q. -- October 2018?
9	Q. I'm asking -- I don't -- I don't want	9 A. The first version was told when Tricia
10	context. I just want a date so we -- and then --	10 McNulty concocted it in a text message to Lisa
11	A. I'm giving you the date, but I got to	11 Barbounis around October 23rd.
12	identify the specific thing so I don't --	12 Q. All right. Concocted it? Concocted?
13	Q. No, you don't.	13 A. Yeah.
14	A. -- mess it up.	14 Q. Okay. Give me a second. Let me write
15	Q. No, you don't, because I -- you're	15 it down. When Tricia concocted it in a text to Lisa
16	going to get there. All right? Just we got to take	16 Barbounis in October 2018. Okay.
17	it slowly so that the record is clear.	17 A. Not October, like --
18	A. I'm going real slow, real slow.	18 Q. Around.
19	Q. So you're saying the date of the first	19 A. -- October twenty -- because if you're
20	story -- and we're specifically talking about AIPAC	20 saying October, there is other events that took place
21	right now and what happened on that couch, what did	21 in October --
22	or did not happen on that couch. Okay? That's what	22 Q. It's not a test.
23	we're talking about right now. And everything that	23 A. -- that was a different version of
24	we're discussing relates to that couch right now.	24 the story --
25	A. Right.	25 Q. You can say in or around.

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1	A. -- than from what they originally said.	1	Q. Mr. Roman, I need a date. I just need
2	THE COURT REPORTER: One at a	2	a date. I don't need to know what's around the date.
3	time, please.	3	Just give me a date. Give me a date.
4	BY MR. CARSON:	4	A. Like I said, I'm trying to tell you --
5	Q. It's not a test. We're going to say in	5	Q. Just give me a date.
6	or around. We have to be able to make -- we have to	6	A. -- that I think --
7	be able to outline this, so --	7	Q. The next words out of your mouth need
8	A. I'm trying to outline this, Mr. Carson.	8	to be a month and a year.
9	You're saying --	9	A. I think the affair started October 23rd
10	Q. No, no, no.	10	and I think that's when the text messages started.
11	A. -- in or around. I'm saying --	11	Q. So then why did you say wrong when I
12	Q. Wait for a question.	12	just said in or around October 2018?
13	A. -- October 23rd.	13	A. Because it's not specific enough. We
14	Q. You got to wait for a question.	14	have to be as specific as possible.
15	A. I'm waiting.	15	Q. No, we don't. We can be general. It's
16	Q. All right. The first version of this	16	easier.
17	concocted, quote/unquote, version, quote/unquote,	17	A. Mr. Carson, I don't want that -- I
18	allegation, whatever, it was when Tricia texted it to	18	don't want that to be my testimony.
19	Lisa Barbounis sometime around October 2018. Okay?	19	Q. Mr. Roman, stop --
20	Is that fair?	20	A. I want to have specific --
21	A. Well, there is multiple references to	21	Q. -- interrupting me.
22	conversations --	22	A. -- testimony.
23	Q. You got to just answer the question yes	23	Q. The court reporter can't take two
24	or no. Is it fair -- if it's not, then correct me.	24	people talking at the same time.
25	A. I'm correcting you. There's --	25	A. Okay.
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1	Q. I'm looking for a date. When?	1	Q. October 23rd, 2018. Done.
2	A. So I give you a date.	2	A. I think. I think October 23rd.
3	Q. Okay. When?	3	Q. When's the last one, the most recent
4	A. I said that the first version that I'm	4	one. Give me a month and a year.
5	aware of or that I remember was based on text	5	A. When -- either when Lisa or Tricia gave
6	messages that I reviewed that you have produced	6	their testimony during their deposition, that's the
7	between Tricia and Lisa around the time that Lisa	7	last time we heard a different version of the story.
8	started having an affair with Danny Tommo --	8	Q. Okay. During the dep. Okay. And
9	Q. That was in -- that was well into 2019,	9	you're saying in between those there were five more
10	so --	10	about?
11	A. No, no, that --	11	A. I would say that there was two versions
12	THE COURT REPORTER: I can't hear	12	of the story, one told by Lisa and one told by
13	you. I can't hear you.	13	Tricia, when they were examined by Dr. Barbara Ziv,
14	THE WITNESS: Mr. Carson, Lisa	14	the forensic psychiatrist that examined both of them
15	Barbounis testified to starting an	15	a few months ago. Lisa told one version of the
16	affair with Danny Tommo on October 23rd,	16	story, Tricia told another version of the story.
17	2018. You should recollect what your	17	Q. Of AIPAC.
18	own client said about her affairs.	18	A. Of AIPAC, that's what we're talking
19	BY MR. CARSON:	19	about, this alleged --
20	Q. Sorry, I don't, but that's fine.	20	Q. Of the couch.
21	A. So -- well, how are we doing -- we got	21	A. -- couch incident that never happened.
22	to be accurate with these dates, so --	22	Q. Of what happened on the couch or what
23	Q. Just give me a date.	23	didn't happen on the couch at the AIPAC conference,
24	A. -- I'm trying to give you the accurate	24	correct?
25	--	25	A. What didn't happen at the couch at the

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1	AIPAC conference.	1	27th, 2019, in the Eastern District of Pennsylvania.
2	Q. We're talking about the same thing,	2	Q. Okay. And I'll represent to you I
3	Mr. Roman, so --	3	copied and pasted all the complaints, so regardless
4	A. We're not, Mr. Carson. We're not	4	of the fact that there is multiple complaints, it's
5	talking about the same thing.	5	all the same, it's all one big story.
6	Q. Okay. We're not. We'll pretend like	6	A. Can you just clarify -- just to
7	we're not. So -- so then you said another version is	7	understand.
8	a version that Patricia provided to Dr. Ziv and	8	Q. Never changed a word of the complaint.
9	another version is a version that Lisa provided to	9	Every time I file a new complaint I just copy and
10	Dr. Ziv?	10	paste --
11	A. Correct. Now we're at five.	11	A. You took the same complaint in
12	Q. No, we're actually at four now, but	12	Barbounis, you put it in McNulty, you put it in
13	that's okay.	13	Yonchek, you put it in Brady?
14	A. Well, no, we have the text message, we	14	Q. No, that's not -- what I'm saying is
15	have --	15	that Ms. McNulty's filed more than one complaint.
16	Q. Text message --	16	She's filed a complaint and an amended complaint,
17	A. -- one testimony from Lisa --	17	another amended complaint. I'm saying all the
18	Q. Right.	18	accounts in those three complaints are the same.
19	A. -- we have another testimony from Lisa	19	A. Okay. Well --
20	-- excuse me, from Tricia, that's three. We have	20	Q. So we're going to say the complaint is
21	Tricia's story that she told Dr. Ziv. We have Lisa's	21	one more story.
22	story that she told Dr. Ziv. So that's five.	22	A. It's not -- it's not, though, because
23	Q. Okay. It would be easier if you just	23	what you wrote in your civil complaint is different
24	let me be -- you answer the questions and let me	24	from what is written in the handwritten complaint
25	organize it. Okay?	25	that either Barbounis or McNulty gave to the EEOC in
1	A. I just want to make sure my testimony	1	or around June 5th of 2019.
2	is accurate.	2	Q. That's called a charge.
3	Q. The first one I have is from October	3	A. So the charge and the complaint -- so
4	23rd, 2018, sometime around, in a text message. All	4	she files a complaint that has one version, she files
5	right? The last one I have is when Lisa provided	5	a charge that has a different version, two different
6	testimony at a deposition. In between those two I	6	versions within two weeks of each other. There is
7	have Patricia providing testimony -- or not	7	more versions of her story than I knew about. This
8	testimony. Patricia providing a statement to Dr. Ziv	8	is -- you're really enlightening here.
9	and then I also have Lisa providing a statement to	9	Q. We're going to take a look at them and
10	Dr. Ziv, and I believe the last one, the sixth one	10	you're going to explain this. All right? I'm just
11	that you're testifying about, is Ms. McNulty	11	--
12	providing testimony at deposition, correct?	12	A. Well, I can't explain anything that
13	A. We're at five and now we have two more	13	didn't happen, Mr. Carson.
14	but there is actually probably five more now that	14	Q. Well, we're going to -- just -- let me
15	you're helping me jog my memory.	15	just lead the way and I'll --
16	Q. So --	16	A. All right. Sorry. My apologies.
17	A. We're at about ten right now. So we're	17	Q. You're doing fine. Just keep going.
18	at five. I'm going to give you another five.	18	All right. So the EEOC charge is another version.
19	Q. We're at five. Just slow down.	19	So we have one, two, three, four, five, six, this is
20	A. I'm sorry.	20	-- that's seven, the charge is number seven. Do you
21	Q. Just give me one more, just one more	21	-- are there any others you want to say -- can I
22	right now.	22	suggest one.
23	A. Okay. So the next one that I recall is	23	A. Well, I think there is a version that
24	Tricia McNulty's accounting of what she says happened	24	Ms. McNulty gave to Mr. Pipes.
25	at AIPAC in her complaint that was filed October	25	Q. That's the one I was about to suggest.

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1	A. That's eight.	1	text messages in this case, so I don't know what she
2	Q. So the letter -- the letter to	2	said to Marnie. I have what we have produced by
3	Mr. Pipes. Okay?	3	Marnie Meyer's counsel in Meyer versus MEF, but there
4	A. No, no, I didn't say -- you're putting	4	has been no evidence or limited amount of evidence
5	words in my mouth, Mr. Carson.	5	produced by McNulty versus MEF. I think there is a
6	Q. Well, I was about to -- it's this right	6	motion for contempt against Ms. McNulty that we're
7	here. This is the letter to Mr. Pipes.	7	waiting to see what Judge Brody is going to say, so I
8	A. Not this. This would be another	8	I can't answer that right now.
9	version.	9	THE WITNESS: Can we take a break?
10	Q. Okay. So -- so you're going to --	10	I got to get some water. Is that okay?
11	well, let's just -- the letter to Mr. Pipes is one.	11	MR. CARSON: Absolutely.
12	Okay?	12	THE WITNESS: Okay. All right.
13	A. There's three or four more versions.	13	Take five minutes?
14	We haven't gone over all the versions yet.	14	THE VIDEO SPECIALIST: We're off
15	Q. Is it fair to say the letter to	15	the record. It's 4:31 p.m. Eastern.
16	Mr. Pipes is one of them; okay?	16	THE WITNESS: Thank you,
17	A. One, but not the last one.	17	Mr. Carson.
18	Q. Not the last one. Okay. The letter to	18	(A brief recess was taken.)
19	Mr. Pipes --	19	THE VIDEO SPECIALIST: We're back
20	A. There is a difference --	20	on the record. It's 4:43 p.m. Eastern.
21	Q. I'll call him Dr. Pipes. And --	21	THE WITNESS: Can you guys see me
22	A. He actually prefers Mr. Pipes. I mean,	22	okay?
23	I know he's got the doctor but --	23	THE VIDEO SPECIALIST: Yes.
24	Q. I don't know. I deal with --	24	BY MR. CARSON:
25	A. But this is not -- this is not the one	25	Q. All right. So, Mr. Roman, screen share
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1	between October 23rd and this -- it says November	1	-- all right. So do you see this right here,
2	4th. I also understand that --	2	Mr. Roman? See it?
3	Q. There is a statement on 11/1.	3	A. Yeah.
4	A. On 11/1 and there is another version	4	Q. I'm going to represent to you this is
5	that McNulty tells Meyer or Lisa, maybe she changed	5	the EEOC charge that was filed at the EEOC, it's been
6	her version from --	6	turned over and marked LBEEOC docs. This is the dual
7	Q. We don't have Ms. Meyer's statement	7	filing letter --
8	here. Can we just --	8	A. Actually it looks like a -- looks like
9	A. No, but you're asking me about every	9	a different document than the one we have from when
10	one that took place. What we do have is the text	10	you first sent it --
11	messages between Meyer and McNulty that was produced	11	Q. Yeah, it's not. It's the exact same --
12	by your coworker Erica Shikunov --	12	I mean, I don't know what you have, but this is what
13	Q. I don't think she --	13	was filed with the EEOC. This is the second charge
14	A. -- that has -- no, but -- I'm not	14	of discrimination. You can tell because of the date.
15	saying -- she has another story of how that went	15	A. Second charge.
16	through, so we must be at like 12 or 13 right now.	16	Q. What?
17	Q. Right now we're at one, two, three	17	A. So this is the second charge.
18	four, five, six, seven, eight, right now we're at	18	Q. This is the second charge for
19	nine.	19	retaliation because of the lawsuits you guys filed
20	A. Nine.	20	against her.
21	Q. I don't have -- I mean, if you want me	21	A. Yeah, I understand that, but what I was
22	to say the version she gave to Ms. -- to Ms. Meyer,	22	saying is that there -- the first charge was in June
23	is that what you want to say?	23	-- you sent that -- there you go. That's June.
24	A. I don't know. Mr. Carson, McNulty	24	Okay.
25	hasn't turned over any discovery except for a few	25	Q. So let's just take a look at how it's

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1	explained -- I mean, look, this is Lisa Barbounis's 2 charge. Lisa Barbounis wrote in her charge in the 3 material facts section Airbnb -- see AIPAC 4 conference?	1 assault is, okay, so it's part legal conclusion, part 2 -- but I don't think it continues. There is no more 3 description of the couch incident in this charge. 4 Okay? Fair enough?	
5	A. It's spelled incorrectly.	5 A. No, the alleged couch incident is how 6 it should be represented.	
6	Q. Sorry. AI, right?	7 Q. What?	
7	A. Uh-huh.	8 A. You're saying there was a couch 9 incident. I'm not acknowledging that there was a 10 couch incident.	
8	Q. So see it says respondent Gregg Roman 9 sat on the couch between charging party Lisa 10 Barbounis and coworker Patricia McNulty?	11 Q. We know -- Mr. Roman, no one is trying 12 to trick you into acknowledging --	
11	A. I can read -- yes, that's what it says.	13 A. You just said couch incident, so I 14 don't want to have the record be incorrect.	
12	Q. All right. So --	15 Q. Let me just -- I'm going to describe it 16 as the couch incident. The couch incident refers to 17 what may or may never have happened on the couch. My 18 client alleges it happened, Mr. Roman alleges it 19 didn't happen. We know. This is what we call a 20 material fact in dispute. We understand that. No 21 one is trying to trick you into saying it happened. 22 I'm just calling it the incident, just -- all right?	
13	A. It's kind of hard to see with the blue.	23 That's what -- fair enough?	
14	Q. What?	24 A. Not --	
15	A. You highlighted it in blue and I 16 couldn't see the text when you highlighted it.	25 Q. When I say the incident I mean what --	
17	Q. It ends right here. Right? This is 18 the part that explains the couch. It goes from 20 to 19 26. Okay? Do you see that?		
20	A. Go up a little bit. Yeah, okay.		
21	Q. 20 to 26.		
22	A. Okay.		
23	Q. Did you read that?		
24	A. 27 has AIPAC in it, too.		
25	Q. 27 is just a legal conclusion.		
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1	A. I'm not -- I don't understand the law, 2 but I can start from 20 and read down to twenty --	1 what you allege didn't happen is fine. We can call 2 that the incident. Okay? When I say incident, I'm 3 alleging -- what I mean by that is what Mr. Roman 4 alleges did not happen on the couch that Ms. McNulty 5 alleges did. That's what that --	
3	Q. I mean, I will suggest to you that this 4 is just my characterization of the facts that my 5 client alleged.	6 A. Correct, did not happen on the couch.	
6	A. Exactly, Mr. Carson. Exactly.	7 Q. Okay. So this is her characterization 8 of what happened on the couch filed at the EEOC, 9 right? That's one of the times you said her story 10 changed?	
7	Q. Right. I made a legal conclusion on 8 behalf of my client.	11 A. Well, actually, it doesn't start at 20; 12 it goes before 20. The whole story -- 18 -- is there 13 something in 17?	
9	A. No, but that's what I'm saying, it's 10 your conclusion of one of at least 12 different 11 versions of what McNulty has said to private people 12 on the public record in different areas. All of 13 these different representations of what she says 14 happened that evening --	14 Q. Let's just make it easy and just 15 relegate it to the couch --	
15	Q. Right. So --	16 A. Mr. Carson, you're showing me a 17 document that's 31 pages long --	
16	A. -- are just -- are just -- they really 17 make what the allegations confusing -- first of all, 18 I'm saying they didn't happen, but, beyond that, she 19 said -- she tells so many different versions in so 20 many different forums --	18 Q. This says -- this says exactly what you 19 already testified to. Respondent and Matt Bennett 20 booked an Airbnb in D.C. Lisa Barbounis had a hotel 21 room. The other female employees including Barbounis 22 also had a hotel room.	
21	Q. Let me -- I understand. You said that 22 already. That's why we just made a list. So let --	23 A. Yeah, but the thing is is that you 24 write in your first complaint against me that I forced McNulty to go to Washington D.C. You said	
23	now we're going to look at what you're talking about.		
24	So I'll represent to you that this -- this part is 25 not a legal conclusion, the calling it a sexual		

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1	that I trafficked her there. So, again, you have a	1	a handwritten complaint that I think -- I think she
2	representation here that's different from a	2	maybe --
3	representation that you made in October that's	3	Q. This? This?
4	different from another representation that your	4	A. I don't know. I'm talking about
5	client made two weeks ago.	5	McNulty's complaint, not Barbounis's. There is a
6	Q. Mr. Roman --	6	handwritten complaint that McNulty filled out -- am I
7	A. So I don't know which one we're talking	7	allowed to ask counsel -- is that okay if I ask
8	about here. If this is like -- if you're asking me	8	counsel something?
9	to comment on this version --	9	Q. No.
10	Q. Yeah, no --	10	A. Not to tell me something, but if we
11	A. -- okay, fine.	11	have a document that I'm referring to and I can say,
12	Q. That's what we're looking at. We're	12	hey, counsel, can you get that document, can he do
13	looking at a charge.	13	that?
14	A. Right.	14	Q. If they want to jump in and say what
15	Q. Right?	15	you're talking about, it's fine, I can pull it up.
16	A. But it's just there's so many different	16	A. Okay. So there is this document that I
17	versions of this, Mr. Carson.	17	reviewed I think like a day or two ago and it was a
18	Q. But we've heard you say that --	18	handwritten --
19	A. I don't know what you want.	19	Q. Did it look like this? Did it say
20	Q. We've heard you say that. We actually	20	charge of discrimination?
21	listed the number of versions that you allege are out	21	A. There was a few. There is the McNulty
22	there and that you --	22	one and there's the Barbounis one. Okay? But this
23	A. I'm not alleging it. You have -- the	23	is specifically McNulty's recollection of the alleged
24	records have showed me. It's --	24	couch imbroglio and it says something in there that's
25	Q. Right.	25	different --
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1	A. -- a material fact not in dispute.	1	Q. What does it say?
2	Q. But what I'm going to show you is that	2	A. -- from this. Can I ask counsel to get
3	they're all the same version, Mr. Roman, but, like,	3	that document so I can be specific?
4	you know --	4	Q. What does it say that's different?
5	A. You can show me whatever you want,	5	A. It says there -- let's go back -- let's
6	Mr. Carson, but --	6	-- let me read 20 through 28 and I'll tell you what's
7	Q. But this is --	7	different. And then I want to read the one that we
8	A. -- I'm just telling you --	8	were talking about. Can I just ask counsel to get
9	Q. -- the version that you --	9	that for me? Is that okay, Mr. Carson?
10	A. -- there's so many stories.	10	Q. If they know what you're talking about,
11	Q. -- that you said that my client made,	11	they're welcome to jump in and say what it is.
12	which she did, to the EEOC on June --	12	A. Okay. Can I do a -- without breaking
13	A. That's not what I'm talking about.	13	privilege I'm going to ask Mr. Gold --
14	Q. It's one of the ones you listed, Mr.	14	THE WITNESS: There is a document
15	Roman.	15	that's a handwritten allegation,
16	A. One of them but not the one I was	16	Mr. Gold --
17	specifically referring to --	17	MR. GOLD: Uh-huh.
18	Q. It's one of the -- it's one, two,	18	THE WITNESS: -- that I may have
19	three, four, five, six, seven, eight, nine, ten, it's	19	read and you were aware that I read
20	one of the ten that you came up with.	20	yesterday, two days ago, you know what
21	A. One of ten.	21	I'm talking about, Mr. Gold?
22	Q. You said there is ten different	22	MR. GOLD: Talking about the
23	versions. This is one of them.	23	charge of discrimination that was filed
24	A. There is this -- the one -- the one in	24	with the commission?
25	this specific one that I'm talking about, is there is	25	THE WITNESS: The handwritten one.

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1	There was one that Mr. Carson typed up	1	is a dual filing, this is the --
2	and sent --	2	MR. GOLD: Keep going.
3	MR. GOLD: Right.	3	MR. CARSON: This is the entry of
4	THE WITNESS: There's a	4	appearance, this is the typed charge --
5	handwritten one either from Barbounis or	5	MR. GOLD: Yeah, this looks like
6	McNulty. Do you have that?	6	it right here. Go ahead. Something
7	MR. GOLD: Matt, can you pull that	7	about escaping -- go ahead, let's see
8	up?	8	what we got here.
9	THE WITNESS: Either Matt or Bill	9	MR. CARSON: I think I know what
10	Rieser, do you guys have that?	10	you're talking about. Here -- I mean, I
11	(Simultaneous speakers.)	11	just gave you a chance to read it, but
12	THE WITNESS: I can't hear you.	12	just take your time and read it slower.
13	THE COURT REPORTER: I can't hear	13	MR. GOLD: Why don't you read this
14	you at all.	14	document, Mr. Roman, see if this is the
15	MR. GOLD: It's the charge that	15	document you're referring to.
16	was filed -- can you hear me now?	16	BY MR. CARSON:
17	THE COURT REPORTER: Yes. Thank	17	Q. So number -- so I'm not starting at the
18	you.	18	dinner because I don't -- I mean, I think those facts
19	MR. GOLD: It's the charge that	19	are probably not as material as what happened on the
20	was filed with the EEOC back in June --	20	couch. So respondent proceeded to put his arm --
21	on June 7th, 2019.	21	A. What allegedly happened on the couch.
22	THE WITNESS: Is that McNulty or	22	Q. The incident that may or may not have
23	Barbounis?	23	happened.
24	MR. GOLD: I think it's Barbounis.	24	Respondent Gregg Roman sat on the couch
25	THE WITNESS: So do we have that,	25	between charging party Lisa Barbounis and coworker
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1	Mr. Carson?	1	Ms. McNulty. Respondent Gregg Roman proceeded to put
2	(Simultaneous speakers.)	2	his arms around both charging party Lisa Barbounis
3	THE COURT REPORTER: Sorry.	3	and coworker Patricia --
4	Everyone is talking at the same time	4	THE COURT REPORTER: Please. You
5	again.	5	have to slow down.
6	(Simultaneous speakers.)	6	MR. CARSON: Sorry.
7	MR. GOLD: Mr. Carson typed up the	7	BY MR. CARSON:
8	actual charge. Here it is right here.	8	Q. Respondent Gregg Roman grabbed coworker
9	That's not -- this is it. Here is what	9	Patricia McNulty by her upper thigh and violently
10	you're talking about. Correct?	10	yanked coworker Patricia McNulty onto his lap.
11	THE WITNESS: Yeah. So it's in,	11	Respondent Gregg Roman then began whispering
12	like, the little -- it's in the thing	12	inappropriate sexual advances in coworker Patricia
13	here, I think in the little sheet --	13	McNulty's ear. Charging party Lisa Barbounis was
14	MR. GOLD: Yeah, keep going down.	14	present and witnessed this violent and aggressive
15	You'll see -- then there's a letter from	15	sexual assault. Coworker Patricia McNulty tried to
16	Mr. Carson to the commission. Keep	16	pull away from respondent Gregg Roman who resisted
17	going. Keep going. Keep going. Keep	17	coworker McNulty -- McNulty's attempts to escape from
18	going.	18	respondent Gregg Roman's grip. Coworker McNulty had
19	THE WITNESS: There is nothing	19	to fight to get away. Once coworker McNulty was able
20	there.	20	to get away she left the room and entered the kitchen
21	MR. GOLD: Yeah, this is not the	21	area. Thereafter charging party witnessed respondent
22	-- this is not the charge. Looks like a	22	Roman leave the room and go upstairs. He did not
23	right to sue letter. Yeah, it's a right	23	return again -- downstairs again.
24	to sue letter, it's not the document.	24	MR. GOLD: Is that the document?
25	MR. CARSON: The dismissal, this	25	THE WITNESS: Well, that's one

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1	version, yeah.	1	THE COURT REPORTER: I'm sorry --
2	MR. CARSON: This document -- for	2	MR. CARSON: -- that are not
3	the record, this document is EEO --	3	proper --
4	LBEEOC Docs 1 through 31, and we'll make	4	THE COURT REPORTER: You guys have
5	that Roman 4.	5	to -- I know Mr. Gold was saying
6	THE WITNESS: Yeah.	6	something but I couldn't hear him. You
7	Mr. Carson, there is a very simple	7	have to talk one at a time, please.
8	reason why this cannot be true.	8	MR. CARSON: For the record,
9	BY MR. CARSON:	9	Mr. Gold instructed the witness not to
10	Q. Okay.	10	answer the question --
11	A. The layout of the way Ms. McNulty --	11	MR. GOLD: Because it was a
12	I'm sorry, this is Ms. Barbounis alleging this, not	12	hypothetical question about African
13	McNulty --	13	Americans, but go ahead. And Mr. --
14	Q. Well --	14	THE WITNESS: Mr. Carson's sound
15	A. -- right?	15	got cut.
16	Q. -- yeah, I mean it's -- yeah.	16	MR. GOLD: -- Mr. Carson told me
17	A. But I don't understand why you would	17	to add it to my list, which I will do.
18	include something that -- what McNulty said in	18	THE WITNESS: I can't hear Mr.
19	Barbounis's allegations. Is this Barbounis's	19	Carson.
20	representation of McNulty or McNulty's representation	20	THE COURT REPORTER: I can't hear
21	of Barbounis?	21	him either.
22	Q. Let me answer with a question. If you	22	THE WITNESS: Mr. Carson, your
23	were discriminating against black people and you	23	sound is off. Your microphone is off.
24	called one black person the N word in front of	24	MR. CARSON: Is it on now?
25	another black person, wouldn't that be discrimination	25	THE WITNESS: Yeah, yeah, now I
1	against both of them?	1	can hear you.
2	A. Mr. --	2	BY MR. CARSON:
3	MR. GOLD: Hypothetical question,	3	Q. So when you subject a female -- if you
4	Mr. Roman, I'm not going to let you	4	subjected a female employee to sexual harassment in
5	answer the question.	5	front of another female employee, it's sexual
6	THE COURT REPORTER: Sorry, Mr.	6	harassment of both of them; do you understand that?
7	Gold, can you repeat that?	7	A. Mr. Carson, I didn't subject anyone to
8	MR. GOLD: Hypothetical question.	8	sexual harassment.
9	I'm directing him not to answer the	9	Q. But you understand that concept,
10	question.	10	correct?
11	BY MR. CARSON:	11	A. What concept?
12	Q. Mr. Roman, it would be discriminating	12	Q. That sexual harassment could be
13	against both of them, correct?	13	witnessing another member of your protected class
14	MR. GOLD: Same objection. Direct	14	being subjected to discrimination based on their
15	him not to answer.	15	gender.
16	MR. CARSON: You can't -- first of	16	MR. CAVALIER: Object to form.
17	all, you can't tell someone not to	17	THE WITNESS: Mr. Carson, I don't
18	answer based on the fact that it's a	18	understand the question.
19	hypothetical. That's not a reason to	19	BY MR. CARSON:
20	tell him not to answer. But if you --	20	Q. Well, you asked why there is an
21	look, I'm going to file a motion with	21	allegation involving McNulty in a charge for Lisa
22	Judge Wolson already because of this	22	Barbounis, and I'm trying to help you understand with
23	deposition. So if you want to add that	23	my questions. If Ms. Barbounis witnessed you
24	to my list of things that you're doing	24	sexually assault a coworker, that could be sexual
25	--	25	harassment for both of them, that's -- do you

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1	understand that?	1 away. She left the room and entered the kitchen
2	A. No.	2 area. There is no two rooms. There is one room. We
3	MR. CAVALIER: Object to form.	3 should get blueprints from this -- and I'm sure you
4	MR. CARSON: Okay. That's fine.	4 can get it from Airbnb. There is no two rooms.
5	BY MR. CARSON:	5 Okay?
6	Q. But that's --	6 Q. So --
7	THE COURT REPORTER: Sorry. Who	7 A. One room.
8	was objecting?	8 Q. -- does it say -- Mr. Roman --
9	MR. CAVALIER: Cavalier.	9 A. That's one.
10	MR. GOLD: No one is objecting,	10 Q. -- does it say she went into another
11	got right to the next question.	11 room?
12	Mr. Carson, maybe you should	12 A. It says she left the room, so if you're
13	consider teaching a course in employment	13 in a room and you leave it, there by logic has to be
14	discrimination next year at law school.	14 a second room. Okay?
15	MR. CARSON: Thank you. Maybe I	15 Q. Because of that you're saying it's
16	will.	16 impossible for this --
17	BY MR. CARSON:	17 A. No, I'm not saying that, I'm saying
18	Q. The --	18 that's one of five reasons why, besides my own
19	A. Your sound went off again. Your sound	19 personal knowledge that it didn't happen, this is
20	went off again.	20 incorrect.
21	Q. All right. So let's get back to it.	21 Q. Mr. Roman, let me ask you a question
22	So -- sorry, you guys are now watching a movie. This	22 real quick about that. Was there --
23	is --	23 A. I have four more, Mr. Carson.
24	A. What movie.	24 Q. Was there a kitchen in the Airbnb?
25	Q. I don't know. Dolly Parton apparently.	25 A. There might be a kitchen, I -- there
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1	Let me get back to this -- here, let me stop so you	1 was a kitchen area, yes, but wasn't in a separate
2	guys don't need to see my calendar.	2 room.
3	All right. So, anyway, my -- look,	3 Q. There was a kitchen area?
4	let's get -- let's get through this. So, look, the	4 A. There was a kitchen area which was part
5	charge of discrimination which is Roman Exhibit 4,	5 of the living room area.
6	which is EEOC Docs 1 through 31, you do see this	6 Q. Isn't that the language in the
7	description which is between Paragraphs 20 and, say,	7 complaint, kitchen area?
8	27, right, Mr. Roman? You see it. That's all I'm	8 A. No, it's not. It's was able to --
9	asking.	9 Q. See what I highlighted?
10	A. Right, what I said was there is no way	10 A. -- get away -- it was able to get away,
11	at all it could be accurate because of the -- the	11 she left the room, so it's three parts, so what she's
12	facts that are alleged in the charge -- one of 12	12 alleging is there is this couch, she's getting up,
13	charges here, but this specific charge of 12, can't	13 she's leaving the couch, and then it says she left
14	be correct. There is no way --	14 the room. So if the kitchen and living room are in
15	Q. Why?	15 the same room, sorry, but the way that it's written
16	A. -- at all, unless all of a sudden a	16 here, it couldn't have happened.
17	building in Washington D.C. has morphed magically	17 Q. Okay.
18	from one way to another, there is no way this could	18 A. No way that could have happened.
19	be true. There is at least five things I can point	19 Q. Okay. I mean, if you think that's
20	out to you that make this incorrect.	20 relevant testimony, then it's now on the record for
21	Q. Just take one at a time and point them	21 you.
22	out.	22 A. It's not what I think is relevant; I'm
23	A. Sure. Number one, the kitchen that's	23 just representing to you my recollection and the
24	mentioned here, what does it say? It says -- hold	24 blueprints of the place where I the individual with
25	on. Where is the kitchen. Here. Was able to get	25 Matt Bennett and Steve Shimel [ph] and Elliot Miller

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<p>1 and Jonathan Hunter and everyone else who was there      2 will testify if you call them to testify, I think      3 they're on our initial disclosures, I think we're      4 having them testify, if they come testify, they will      5 testify there was never a different room between a      6 kitchen and the living room. It was all one room.      7 So this statement, Number 26 --</p> <p>8 Q. You said that one now. What's the      9 other --</p> <p>10 A. -- at least half of it is completely      11 inaccurate. Number two --</p> <p>12 Q. Because it says left the room, it means      13 that it couldn't have happened.</p> <p>14 A. Right. Number two --</p> <p>15 Q. Okay.</p> <p>16 A. Let's look at Number 27. Okay? It      17 says that this individual is yanked across the couch.      Okay?</p> <p>18 Q. Where does it say yanked across the      19 couch.</p> <p>20 A. Right there, right there, when he      21 violently yanked. That's what you allege. That's      22 what your client alleges. This is Lisa alleging it.</p> <p>23 Q. Can you -- can you talk about -- can      24 you say what you're talking about?</p>	<p>1 A. So what you're saying is is is that      2 there's two -- I guess we can't really do a      3 stenographic representation of where two people are,      4 but the laws of physics -- and I'm not -- I might be,      5 like, you know, a former wrestler or whatever, but to      6 lift somebody up to yank across the couch would mean      7 that there would have to be contact with someone      8 else, the actual positioning on the other side --      9 Mr. Carson, I'm not that able, I got a bad back, I      10 got a bad other side. There is no way that I would      11 have the strength even to do what's being alleged      12 there. Okay? I don't have the --</p> <p>13 Q. Okay.</p> <p>14 A. -- physical acumen to be able to do      15 such a thing. Now, beyond that, the third reason why      16 this didn't happen according to at least what's in      17 this charge --</p> <p>18 Q. Well, wait. Just to get it straight,      19 Mr. Roman, number one is because it says left the      20 room and number two is because you don't have the      21 physical acumen to yank someone --</p> <p>22 A. No, not just that, it would be      23 physically impossible -- the laws of physics would      24 not allow one person be lifted from one side across      25 the other side without contact going on someone else,</p>
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<p>1 A. Number 27. Okay? What it says there      2 says -- this allegation, this incorrect allegation,      3 is when he -- when he yanked across the couch. Okay?      4 So you have yanked across the couch. What you're      5 saying is is that there is -- Barbounis you're saying      6 is on one side, you're saying McNulty is on the other      7 side, unless the implication is is that they're on      8 the same side, okay -- what does it say there? It      9 says Barbounis was present and witnesses this -- this      10 thing, and this is -- this is where the problem      11 exists with the multiple representations. When she's      12 talking to Ziv, okay, she says that there is one      13 person on the couch on one side and there is another      14 person on the couch on the other side.</p> <p>15 Q. Isn't that what it says here?</p> <p>16 A. This -- this implies, if we can go up      17 to 20 --</p> <p>18 Q. Doesn't --</p> <p>19 A. -- was sitting on the couch --</p> <p>20 Q. -- Number 20 say that --</p> <p>21 A. -- between -- listen. Hold on a      22 second.</p> <p>23 Q. Mr. Roman --</p> <p>24 A. -- between Barbounis and McNulty.</p> <p>25 Q. Right.</p>	<p>1 and even if there was contact on someone else, the      2 ability to have two hands cross sitting on a couch I      3 don't see how it works. I'm not someone who deals      4 with anatomy, but to me that doesn't seem like it's      5 possible.</p> <p>6 Q. Okay.</p> <p>7 A. The third reason that I don't think      8 that this is possible is because of -- if we go to --      9 where is the upstairs part. Here, the second      10 sentence after the kitchen. Thereafter, charging --      11 hold on. Up. Go up. Thereafter charging party      12 witnesses respondent Roman leave the room and go      13 upstairs. Mr. Carson, there was no upstairs. It was      14 a one level --</p> <p>15 Q. So because of that it didn't happen.</p> <p>16 A. No, I'm giving you my analysis of      17 multiple reasons why I think beyond my own personal      18 denial that anything happened --</p> <p>19 Q. Do you have another reason?</p> <p>20 A. -- that this would be -- I do. I'm      21 just saying --</p> <p>22 Q. Go ahead. We got this one.</p> <p>23 A. -- there was no -- there was no      24 upstairs, so now we have three reasons why what she      25 writes here is completely unpalatable in my opinion.</p>

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1	Q. Can you -- can we --	1	being specific enough before --
2	A. Beyond my own personal denial. The	2	Q. Mr. Roman, let's go. What's number
3	fourth reason --	3	five?
4	Q. Mr. Roman --	4	A. -- and now I'm trying to be more
5	A. Yes.	5	specific.
6	Q. -- just slow down for a second. Okay?	6	Q. Okay. What's number five?
7	A. Sure.	7	A. The fifth reason is because Ms.
8	Q. You've listed three reasons so far.	8	McNulty, at least from what I remember Ms. McNulty
9	A. Three reasons. I have two more to go.	9	being, had been engaging in intimate and I would say
10	Q. Tell us number four and just please be	10	deep conversations of -- she was pretty inebriated
11	brief and so we can get through this.	11	that evening, with Raheem Kassam and Lisa Barbounis.
12	A. Mr. Carson, I'm trying to give you the	12	She had spent the evening trying to be with
13	most accurate representation of what I remember from	13	Mr. Kassam and even elected to stay at that apartment
14	that evening as it relates to everything else.	14	and slept there after you're alleging -- or she's
15	Q. Just give us number four. Let's go.	15	alleging that she was sexually assaulted. So this is
16	A. The fourth reason is because in terms	16	what I don't understand. She mischaracterizes --
17	of my own placement of where I was that evening --	17	Q. We got it. She was talking to -- she
18	Q. Right.	18	was talking to Kassam, so it couldn't have happened.
19	A. -- was sitting at the center of the	19	A. It's not just that she's talking to
20	table surrounded by all members of the Pinsker Centre	20	Kassam. This is my final analysis. She doesn't
21	for the entirety of the evening, there was never a	21	remember what the place looks like. She
22	time that I would have sat on a couch, and, if there	22	mischaracterizes the room. She doesn't remember how
23	was, it wouldn't be sitting next to Barbounis or	23	many people were there. And there is no other
24	McNulty. Could I have maybe been sitting next to	24	witnesses to what happened beyond Ms. Barbounis who
25	them? Maybe. It was a long -- it was two and a half	25	has her own reasons and motivation to say something
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1	years ago. But I specifically remember engaging in a	1	negative about me. She doesn't even remember what
2	game of Battleship against Elliot Miller, the game	2	the layout of the actual people and who was there,
3	which we had taken from the previous bar that we had	3	what was there, what was talked about. And, lastly,
4	been from --	4	her condition itself is misrepresented 12 separate
5	Q. What's number five?	5	times in 12 different stories.
6	A. That's four.	6	Q. What condition is that?
7	Q. Right.	7	A. The condition that she alleges she was
8	A. Not five.	8	in saying that she was assaulted, and that never
9	Q. What's number five?	9	happened, Mr. Carson.
10	A. That's four.	10	Q. Okay.
11	Q. I asked you what is number five.	11	A. That's why she's telling a lie, or
12	A. Well, I'm saying that that's the other	12	maybe she's just become so engrossed in this over the
13	reason, and also --	13	past year and a half, two years, three years,
14	Q. We got that one. Go ahead.	14	whenever she concocted this, that she's eventually
15	A. Mr. Carson, I'm trying to give you a	15	become part of the tissue of lies that Ms. Barbounis
16	complete answer.	16	has spread to so many different people and has caused
17	Q. I know but we're just -- we got more to	17	so much damage to so many people through her own
18	go through, so, like, give us the fifth one so we can	18	self-proclivities and malingering behavior.
19	get -- I'm trying to give you an opportunity to give	19	Q. Or maybe you just sexually assaulted
20	us the reasons.	20	her at a party and screwed up because you were
21	A. I'm giving you the reasons and I'm	21	drinking and smoking weed, right?
22	trying to take my opportunity to tell you what the	22	A. No, Mr. Carson, that never happened,
23	reasons are.	23	and I do not appreciate the opportunity you've tried
24	Q. Go ahead.	24	to take to either oppress, harass, or annoy me as a
25	A. Okay? You had complained that I wasn't	25	deponent in today's deposition.

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1	Q. Mr. Roman, what are you, just like the 2 unluckiest person on the planet?	1	about what Alana Goodman allegedly said -- 2 Q. My question, Mr. Roman, was, is that 3 sexual harassment, that behavior?
3	A. Well, Mr. Carson, I would characterize 4 you as the unluckiest person on the planet because 5 these are your clients, but I didn't choose that; you 6 did.	4	A. No, Mr. Carson, because it didn't 5 happen. You have to be able to take into account the 6 entirety of the story and the explanation I have to 7 give if you want to know what I think about it.
7	Q. Well, why -- so how many women have 8 accused you of sexual harassment in the last, say, 9 ten years?	8	Q. Well, Alana Goodman described in detail 9 it happening, so was she lying?
10	A. Well, if we take your clients --	10	A. What -- my interpretation of what Alana 11 Goodman said is that I found out that a friend of 12 mine -- and you've never asked me what's the story 13 that Alana Goodman was talking about and did Alana 14 Goodman ever get the story, did she ever continue 15 communications with me afterwards, was there any 16 conversations that I've had with her after your 17 client recorded her without her knowledge of her 18 being recorded. Was --
11	Q. Yeah, let's --	19	Q. Does that matter?
12	A. -- and if we take --	20	A. It all matters because maybe the tape 21 that you played for Daniel Pipes on Wednesday, or on 22 Tuesday, was not the full recording of the 23 conversation between Ms. Goodman and Ms. Barbounis at 24 the Schuyler Arms Tavern [ph] on June 26th, 2019. 25 Maybe you should have done a little bit more
13	Q. -- let's start with them.		
14	A. -- and if we take -- well, I think the 15 answer is anyone who has been represented by the 16 Derek Smith Law Group in an attempt to get over \$30 17 million from the Middle East Forum, that's how many 18 people have represented --		
19	Q. Leah -- Alana Goodman?		
20	A. I'm giving an answer.		
21	THE COURT REPORTER: I can't hear 22 you.		
22	BY MR. CARSON:		
23	Q. Well, the answer is a number, right? 24 So give me the number of people.		
25			
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1	A. There is no number. The number is 2 however many clients you have. From what I 3 understand --	1	investigation into what actually happened there, 2 Mr. Carson.
4	Q. Let's count --	3	Q. Well, what do you think happened there?
5	A. -- Alana Goodman -- Alana Goodman --	4	A. This is what I think happened. I think 5 Ms. Barbounis was right on the precipice of filing 6 her EEOC complaint against me and my organization in 7 Philadelphia with you as her attorney. She started 8 going out trying to misrepresent everything that ever 9 happened when she was an employee of the Middle East 10 Forum up until that time and she told a story of lies 11 to Ms. Alana Goodman and Goodman herself said, you 12 know what, maybe there is something that I'm going to 13 say happened when Roman wasn't even an employee of 14 the Middle East Forum and had found out that the 15 White House advisor for counterterrorism had told him 16 that the man responsible for murdering his friend, 17 beheading his friend, the day that his son was born 18 -- maybe you didn't hear about this, Mr. Carson --
13	Q. You don't call it an accusation of 14 sexual harassment when she says that you whipped your 15 penis out in front of her at a bar and told her --	19	Q. I'm waiting for a link.
16	A. No --	20	A. -- was not going to be assassinated --
17	Q. -- that --	21	was not going to be assassinated by President Obama.
18	A. -- what she said is --	22	Okay?
19	Q. Let me finish my question, Mr. Roman.	23	Q. Mr. Roman --
20	A. I'm listening.	24	A. On --
21	Q. -- and you told her that she needed to 22 come -- that you needed to come to her hotel room in 23 order to get a story and that you wanted to trade sex 24 for stories?	25	Q. -- I'm waiting for you to link this to
22	A. No --		
23	Q. That's not sexual harassment?		
24	A. -- Mr. Carson, if you had done your 25 investigation and you had looked into the background of that, you would realize that there is four things		

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1	what she -- 2 A. I'm linking it to you, Mr. Carson, 3 because the conversations that I had with Ms. Goodman 4 after this tape allegedly took place would show you 5 that I, first of all, don't even remember any of this 6 happening, but even to the extent that someone may 7 have, I don't know, you know, urinated on the side of 8 a building, the way it was characterized, it was a 9 complete mischaracterization of everything. I cannot 10 wait until you bring Ms. Goodman forward as a witness 11 in this case -- 12 Q. Me neither. 13 A. -- so she can tell what happens. 14 Q. Okay. 15 A. That's what I'm waiting for, 16 Mr. Carson. Maybe you would like to depose her, too. 17 Q. I would suggest to you that you'll have 18 that opportunity. So -- 19 A. Beyond anything else, I would have to 20 see why she's even relevant to this case due to the 21 fact that any interactions that took place between me 22 and her from August of 2015 until today have been one 23 of a professional nature -- 24 Q. When is the last -- 25 A. -- and not what Ms. Barbounis has on a	1 didn't get into my professional history, but I'm also 2 an investigative journalist -- 3 Q. Mr. Roman -- 4 A. -- if you want to see my work -- 5 Q. -- I'm not asking questions about that 6 right now. 7 A. You're asking me -- you're asking me 8 how I may know that Alana Goodman represented -- 9 Q. No -- 10 A. -- that what she said on tape wasn't 11 the whole story -- 12 Q. Right. Who told you that? 13 A. -- or wasn't accurate story. 14 THE COURT REPORTER: One at a 15 time. 16 BY MR. CARSON: 17 Q. Who told you that the recording was 18 made without her knowledge? 19 A. Mr. Carson, I'm going to invoke 20 Pennsylvania Shield Law and the journalist's 21 privilege in terms of giving you that answer. 22 Q. You can't. 23 A. I just did. 24 Q. You can't -- I mean, you're giving me a 25 lot of good reasons to make -- to make it so we're
1	tape that she surreptitiously made as she's done to 2 so many other people. 3 Q. When is the last time you spoke to 4 Ms. Goodman? 5 A. I actually printed out -- and I can 6 volunteer to give this to you -- 7 Q. I just want a date. 8 A. Probably at the end of 2019. 9 Q. Did you ask her about the recording? 10 A. I didn't know about the recording at 11 the time -- 12 Q. Have you ever spoken to her about the 13 recording? 14 A. No, I have not. 15 Q. How do you know that it was made 16 without her knowledge? 17 A. I can't comment on privileged matters, 18 Mr. Carson. 19 Q. That's not privileged. 20 A. No, I'm saying that there may or may 21 not have been a conversation between counsel, but I'm 22 not a hundred percent sure. I do know, though, that 23 a story that I've been investigating writing as it 24 relates to Lisa Barbounis for the better part of the 25 last year and a half -- one of the other jobs -- we	1 going to have to come back and do this all over 2 again. 3 A. Mr. Carson, I'm willing to talk to you 4 all night. 5 MR. CAVALIER: We can make it very 6 simple. Lisa admitted during her 7 deposition that she didn't (indiscernible). 8 MR. CARSON: Jon, you're not 9 testifying here today. 10 THE COURT REPORTER: Sorry. Mr. 11 Cavalier, I didn't hear what you said. 12 MR. CARSON: He didn't say 13 anything. 14 BY MR. CARSON: 15 Q. Mr. Roman -- 16 A. Sure. 17 Q. -- did you ever tell Ms. Goodman that 18 you wanted to go -- form a relationship with her 19 where you would give her stories in exchange for sex? 20 A. No, never. 21 Q. Did you ever pull your penis out in 22 front of her? 23 A. No, never. 24 Q. So she's lying then, right? 25 A. No, she's not lying. She's

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1	mischaracterizing what she saw.	1	A. That's subject to trade secrets. I'm
2	Q. Okay. So --	2	open to discussing it under seal, if you're okay with
3	A. Everything in your world is binary,	3	that, Mr. Carson.
4	lie, not lie. No. I just told you what I think	4	Q. Yeah, I mean you can mark any documents
5	happened.	5	confidential if you --
6	Q. Has Daniel Pipes ever spoken to you	6	A. As Ms. -- can we mark this part as
7	about Ms. Goodman?	7	sealed here or at least the subject of the
8	A. No, he hasn't. Actually, no, that's	8	conversation being sealed?
9	not true. He has spoken to me about Ms. Goodman.	9	Q. I will -- I promise you I will not file
10	Q. In connection with her claims that you	10	anything that you're about to say on the docket. If
11	were trying to trade sex for stories?	11	I file it, I'll file it under seal.
12	A. No, he never spoke to me about that.	12	A. Okay.
13	MR. CAVALIER: I'm going to object	13	Q. Please let me know --
14	to the form on the use of the word	14	MR. CAVALIER: We'll take that
15	claims.	15	representation.
16	THE WITNESS: Okay, that's fair.	16	MR. CARSON: Jon, okay?
17	BY MR. CARSON:	17	MR. CAVALIER: Yeah, we'll accept
18	Q. All right. Let's continue. So --	18	that, Seth. Thank you.
19	A. Mr. Carson, if you'll just give me one	19	THE WITNESS: Am I -- Jon, can I
20	second, I'm going to put the light on here so it gets	20	talk about this?
21	better. Okay? Is that fair?	21	MR. CAVALIER: Yes. So long as
22	Q. Yeah, go ahead.	22	Mr. Gold is okay with it.
23	THE VIDEO SPECIALIST: We're off	23	THE WITNESS: Mr. Gold?
24	the record. It's 5:18 p.m.	24	MR. GOLD: I'm fine.
25	MR. CARSON: We don't have to go	25	THE WITNESS: Okay.
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1	off the record.	1	BY MR. CARSON:
2	THE WITNESS: Sorry about that.	2	Q. Please let me know when you're -- when
3	Is that better?	3	we're done because -- you know what I mean --
4	MR. CARSON: Back on the record.	4	A. This part, Mr. Carson, covers the
5	THE VIDEO SPECIALIST: We're back	5	activities of MEF from the end of December 2017 until
6	on the record. It's 5:18 p.m.	6	I would say like April 25th, 2018, not as it relates
7	BY MR. CARSON:	7	--
8	Q. Mr. Roman, did you take Lisa Barbounis	8	Q. But listen to my question. My question
9	to Israel?	9	is why didn't you want Mr. Pipes to know -- Dr. Pipes
10	A. Yes.	10	to know --
11	Q. Did you tell Daniel Pipes that you were	11	A. Well, I'm sharing that with you.
12	going to take her to Israel?	12	Q. Okay. That you're -- so, for the
13	A. When?	13	record, the question is why didn't you want Dr. Pipes
14	Q. When you took her to Israel.	14	to know that you were going to bring Lisa to Israel.
15	A. I told Matt Bennett, I told Marnie	15	A. Well, I never said that I didn't want
16	Meyer, I told Tricia McNulty, I told EJ Kimball, I	16	him to know that I was bringing someone to Israel.
17	told --	17	That's a mischaracterization of what I'm about to
18	Q. My question was --	18	say. You're asking me why there was a general
19	A. -- most of the MEF staff, and I said to	19	nonannouncement of which staff were going to Israel.
20	Mr. Pipes that there was a staff trip to Israel, but	20	Is that fair characterization of my -- what my answer
21	I never told him which staff went. So in terms of	21	will be?
22	the general answer, yes, I said that she was going to	22	Q. No, Lisa Barbounis alleged that she was
23	Israel, but I never used her specific name.	23	told that -- not to say anything, that you instructed
24	Q. Why didn't you want Daniel Pipes to	24	her not to tell anyone that you were going to take
25	know that you were taking her?	25	her.

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1	A. That's correct.	1	staff, by the way, the story, too, about why we were
2	Q. So why did you give her that	2	taking these precautions. I was almost put into an
3	instruction?	3	Egyptian jail. If you're familiar with Cairo's
4	A. So in December of 2017 -- this part's	4	Scorpion prison, Mr. Carson, it's where ISIS, Al
5	the part under seal. Okay? In December of 2017 I	5	Qaeda, Hezbollah, Muslim Brotherhood, all the bad
6	was approached by an individual who works for a	6	guys are in. I was in a car about to be taken to the
7	middle eastern government that the United States is	7	prison until an embassy official from this country we
8	allied with asking us to put together a plan that	8	were dealing with said it's okay, he's fine, and then
9	would take on Iran, the Islamic Republic of Iran, and	9	I went on my way to stay at the Four Seasons in Cairo
10	this involved seven different trips that took place	10	next to the Giza Zoo, G-i-z-a Zoo. There's a few
11	over five months starting with a trip to Italy and	11	Four Seasons there. Across from the Nile River. The
12	then a trip to Israel, which is right around when the	12	next day I got into a car with Mr. Dashti and we
13	Patriots were playing the Eagles in the Superbowl,	13	drove about two and a half hours out to a military
14	and -- by the way, at each of these trips that took	14	base, an Egyptian military base, between Alexandria
15	place we stayed at Airbnbs. We did not stay at	15	and Cairo --
16	hotels. Okay?	16	Q. When is this?
17	Q. Who is we?	17	A. -- where -- this is in January of 2018.
18	A. The people who went on these different	18	Q. Right. So we're about four months away
19	trips. Multiple staff members and multiple MEF	19	from where we're talking about.
20	contractors went on multiple trips regarding what we	20	A. You're six weeks away from what we're
21	call in the organization The Little Project. Okay?	21	talking about.
22	Q. I just want to relegate our	22	So we went there and -- like I said, it
23	conversation to the one that --	23	was around the time of the Superbowl, the Patriots
24	A. Well, I'm giving you the reason --	24	were playing the Eagles. We watched that game in
25	Q. -- one that --	25	Israel, went to Italy, went to Egypt, and we came
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1	A. -- why. So there was -- I'm sorry, the	1	back. There I have never been more afraid for my
2	stenographer is shaking her -- did I not say	2	life besides the time that I was in the army because
3	something?	3	of the work that MEF was doing. I recorded a video
4	THE COURT REPORTER: No, you guys	4	with Matt Bennett which would be released in the
5	are just talking all over each other. I	5	event of my demise. And the reason I say all of this
6	know I keep saying it, but you guys keep	6	is because a man named Michael Levin who I was
7	doing it, so please try to talk one at a	7	friends with died after being murdered by Hezbollah.
8	time, I would appreciate it.	8	A man named Steven Sotloff who was the second hostage
9	THE WITNESS: Okay. My apologies.	9	killed by ISIS in September 2nd -- there is -- yeah,
10	Mr. Carson, can I continue?	10	September 2nd, 2014 -- I saw him beheaded,
11	BY MR. CARSON:	11	Mr. Carson. I went into a downward spiral for the
12	Q. Yeah, so -- but just -- just listen to	12	better part of a year between 2014 and 2015 because
13	the question. So --	13	this is the subject of the kind of work that we do.
14	A. Sure.	14	If we don't take security precautions like the ones
15	Q. -- why was it that you told Lisa not to	15	I'm laying out to you right now, people can die. I
16	tell anyone that you were taking her to Israel, just	16	am not exaggerating this. If you would like to speak
17	quick, quick answer. I don't need a whole backstory.	17	with anyone who is on our board or if you would like
18	A. Well, the whole backstory is the reason	18	to speak with other staff who are involved in this --
19	for the answer, Mr. Carson. So -- it is. So I	19	I've got a guy right now who has been rotting in a
20	started off in Italy, then went to Israel, then with	20	Turkish prison for the past three years because he
21	a man named Nir Dashti, N-i-r, space, D-a-s-h-t-i,	21	didn't take proper security measures. So if you're
22	Nir Dashti, I traveled back from Israel to Italy and	22	asking me -- if you're asking me why there was an
23	then from Italy I went to Cairo. I was held up at	23	instruction to compartmentalize information from a
24	the airport in Cairo from about 2 in the morning	24	relatively new employee who only been working with us
25	until about 5 in the morning, and I -- I told the	25	for five to six months -- by the way, that employee

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1	was the third person who was asked to go on this 2 trip. First it was Bennett, a man who speaks Hebrew, 3 then it was Meyer, someone who is 20 years my senior 4 and has extensive experience who wanted to violate 5 the security protocols that we had put in place so no 6 one would be hurt, and lastly -- 7 Q. How did she want -- 8 A. Excuse me? 9 Q. How did she want to violate the 10 security protocols? 11 A. If you stay in a hotel, when you are 12 doing the kind of work that we were doing -- think 13 about it for a second. You have staff that are 14 there. You have someone cleaning your room. You 15 have two people who are different. You have 16 individuals that come and go. You have no ability to 17 have physical security over your own space. Now, if 18 you want to speak about the exact place where we 19 were, I actually got pictures of that apartment that 20 I would be very happy to make available to you. 21 Again, the architecture, the design, whatever else. 22 And also there is a list of 15 people that we met 23 with between March -- I'll give you the exact date, 24 March 11th and March 15th, March 11th and March 16th, 25 including representatives of Israel's intelligence	1	Q. Okay. Is this the -- is this -- can 2 you see that? Hold on. 3 A. I can't see anything. 4 Q. I don't know why my screen share isn't 5 working. Start screen share. So -- here. Is that 6 where you stayed? 7 A. Yes. 8 Q. And how many bathrooms did it have? 9 A. We found out there was one but we 10 thought that there was two. 11 Q. Did you -- why did you think there was 12 two? 13 A. Ms. Barbounis booked the Airbnb. 14 Q. You didn't promise her that there would 15 be two bathrooms? 16 A. No, what I said was -- 17 Q. That each of you would have your own 18 living space? 19 A. No, what I -- there was a living space. 20 If you look at the curtain there behind the section, 21 so if we look at this for a second -- can you zoom in 22 on that? Go to the right. So this is the common 23 area where meetings were held. Okay? And if you go 24 there, back there, in that room with the shades or 25 whatever you want to call it, that's where they were,
1	agencies, one of the commanders from Israel's police 2 department, members of parliament, individuals who 3 disagree with MEF, and we actually have affidavits 4 that I know you asked about in Mr. Pipes' deposition, 5 but also that -- can I talk to counsel for a second 6 just to direct them to do something? 7 Mr. Cavalier, Mr. Gold, if you have 8 those affidavits, please give them to Mr. Carson so 9 he has more context for this. 10 They will attest to not just the manner 11 of why we had to keep this secret, but they will also 12 attest to the veracity of what I'm telling you right 13 now in terms of the subject of this. In fact, it was 14 Lisa Barbounis who worked on the presentation that 15 eventually was given to a senior minister in the 16 government of who I'm talking to, and that senior 17 minister accepted the work that we were doing. So 18 any mischaracterization of why information security 19 protocols and compartmentalizing personnel -- 20 personnel and personal security at that time never 21 told you the whole story, and if they did you would 22 know all this of what I'm saying to you right now. 23 Q. So you did tell Marnie Meyer then that 24 she couldn't go if she wanted to get her hotel room. 25 A. Hundred percent.	1	and if you go to the right, there is a kitchen -- 2 again, it's like this combined kitchen/living room 3 area like we were talking about beforehand. There 4 was a bomb shelter, a restroom, and another bedroom. 5 So on the complete opposite ends of where people 6 were. 7 Q. Is this a bedroom right here? 8 A. Yeah, back there, that's where she 9 chose to stay. 10 Q. When you say she chose to stay there, 11 how many rooms were in -- how many bedrooms were 12 there? 13 A. Three. 14 Q. And was there -- where was the other 15 two bedrooms? 16 A. So if you click there -- 17 Q. Oh, you know why? It's a screen shot. 18 That's why I can't -- it's not the website. 19 A. Actually, if you zoom in on those 20 screen shots -- 21 Q. They're going to be -- 22 A. That's -- you can't really see -- 23 Q. But, Mr. Roman, was it one of these two 24 couches that you were on when she alleges that you 25 put your foot up her butt?

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1	A. Mr. Carson, that never happened, so I 2 can't answer a question that's based on a factual 3 predicate that never happened.	1 Q. Mr. Roman, are you attempting to invoke 2 a protection under Israeli law right now?
4	Q. Well, did the two of you sit on one of 5 those two couches one night?	3 A. I am.
6	A. Could you be more specific?	4 Q. Okay. All right. So my client alleges 5 that you came back to the room and began to describe 6 in detail different sexual encounters with different 7 women. Did that happen?
8	Q. Yeah, did you come home drunk after 9 going out and come back and start talking about 10 inappropriate sexual things in front of Ms. Barbounis?	8 A. No.
11	A. No, Mr. Carson, that never happened.	9 Q. My client alleges that you asked her 10 for a blowjob when you got back to the room. Did 11 that happen?
12	Q. You didn't try to have sex with Leah 13 Merville while you were there?	12 A. No, Mr. Carson, I find this offensive.
14	A. No, Mr. Carson, and just in terms of 15 general questions of a nature which may regard any 16 intimacy or alleged intimacy, I'm going to invoke my 17 privacy privilege under Israel's basic law for human 18 dignity and liberty as amended in 1989.	13 Q. It's important to -- for you to put 14 your position on the record because these are 15 certainly issues of material fact that are in 16 dispute. So it's important that you dispute them. I 17 think your counsel would probably agree with that.
19	Q. That's not a privilege you can invoke 20 in this case.	18 My client alleges that during this trip 19 you asked her to engage in different sexual acts with 20 her, primarily -- maybe even exclusively, oral sex.
21	A. Actually it is and I'm going to invoke 22 that since the -- well, actually, if counsel has an 23 answer to further give reason for that?	21 Did that ever happen?
24	Q. I mean, look, you can do whatever you 25 want, we'll just make a record of it and then we'll	22 A. No.
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1	deal with it --	1 A. No, I disagree, and there would be two
2	A. Sure.	2 specific instances that I can account that would
3	Q. So Ms. Barbounis alleges that you sat	3 prove that disagreement. The first would be an
4	down on the couch next to her and put your foot under	4 employee review that all new Middle East Forum
5	her butt and put it up there and then said now that	5 employees receive between six to seven months into
6	my foot is up your butt or in your butt or next to	6 their tenure that Ms. Barbounis had in May of 2018.
7	your butt then I guess we can take our relationship	7 She had a full review, and that review included the
8	to the next level or something of that nature. Did	8 opportunity to give feedback on me to Mr. Pipes
9	that happen?	9 directly, which she did. And I'm sure if you don't
10	A. No.	10 have a copy of that review, you should get one. And
11	Q. Did you -- did you describe having	11 the second instance is my intention to promote Lisa
12	sexual intercourse with Leah Merville to my client?	12 Barbounis up until the time when she told gross lies
13	A. No.	13 about me on October 31st, 2018, in a note to
14	Q. Did you say to my client how nice her	14 Mr. Pipes. So there is really this dissonance
15	body was when you were having sex with her?	15 between what happened according to the textual record
16	A. No.	16 and the lies she's been telling since October of
17	Q. Did you try to have sex with anyone	17 2018, and it goes all the way throughout today, to
18	else while you were in Israel besides Leah Merville?	18 this very point.
19	A. Mr. Carson, again, that question is	19 Q. Why would she lie?
20	based on a factual predicate of an event that never	20 A. Ms. Barbounis as from at least what I
21	happened, and, beyond that, I am not going to answer	21 understand, according to a -- whatchamacallit, a
22	any questions that you ask that are related to a	22 supplemental report that was filed with Barbara Ziv
23	privacy privilege that I have as an Israeli citizen	23 is I think the best record of why Ms. Barbounis would
24	under Israel's basic law of human dignity and privacy	24 not just lie but would wrap herself in a shroud of
25	1989.	25 dishonesty which has been going with her ever since

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<p>1 she was accused of having sexual relations with      2 Congressman Ryan Costello prior to working at the      3 Middle East Forum. So this is something that      4 backdates before she even started for MEF.</p> <p>5 Q. Your testimony is that she lied because      6 she had sex with somebody else? I don't      7 understand --</p> <p>8 A. No, that's not what I said. I said her      9 shroud of lies predates her time of working with the      10 Middle East Forum. To ask me what I think Lisa      11 Barbounis thinks is to ask me what, I don't know,      12 Vladimir Putin thinks. I'm not in the man's head but      13 I see his destruction. The same thing with Lisa, I'm      14 not in her head, but wow have I seen how much she has      15 ruined people's lives not just by -- hold on. Not      16 just by what I have seen happen to me personally      17 because of the wealth of dishonesty that is in her      18 reserves of just self-destructive behavior but also      19 from what I've seen from other people. For instance,      20 she ruined the lives of Danny Tommo and Jazmin      21 Bishop, two people -- I would categorize them as      22 whistleblowers that came to the Middle East Forum,      23 and then she employed a web of criminals -- she      24 employed a web of criminals in the United Kingdom to      25 try to, A, tamper with their testimony; B, try to</p>	<p>1 A. Not Jazmin Bishop. The full name is      2 Kalina Jazmin Bishop. Those are the first two.      3 There is about ten people that I can think of of      4 where Ms. Barbounis has been like a hurricane      5 destroying entire villages. You know, she literally      6 lives in a Potemkin village.</p> <p>7 Q. All right. So let's just -- let's just      8 do the list. All right? So I just want to hear the      9 names of the people whose lives she ruined. Okay?</p> <p>10 A. Sure.</p> <p>11 Q. And then I'll ask you about them, so      12 you don't have to go into why --</p> <p>13 A. Sure. So I prepared this for you if      14 you just want me to give this to you after we're done      15 this right now.</p> <p>16 Q. That's fine, but just Danny Thomas,      17 Kalina Jazmin Bishop. Who else?</p> <p>18 A. Caitriona Brady.</p> <p>19 Q. She ruined Caitriona Brady's life?</p> <p>20 A. Yeah.</p> <p>21 Q. Why?</p> <p>22 A. Well, let's use Caitriona Brady's own      23 words.</p> <p>24 Q. Okay.</p> <p>25 A. Brady says she doesn't trust Lisa at</p>
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<p>1 silence them as witnesses; C, obstruct the justice by      2 try to prevent the turnover electronic devices to the      3 Middle East Forum, and even going so far as to take      4 over an enterprise to be able to try to silence them.      5 I mean --</p> <p>6 Q. What are you --</p> <p>7 A. -- you have to see --</p> <p>8 Q. -- talking about, Mr. Roman?</p> <p>9 A. She has -- she has been --</p> <p>10 Q. Mr. Roman --</p> <p>11 A. -- so beyond --</p> <p>12 Q. -- stop and let me ask the questions.</p> <p>13 A. Sure.</p> <p>14 Q. I'm going to ask you all about this      15 now. Okay?</p> <p>16 A. Sure.</p> <p>17 Q. So stop so we can get -- so we can put      18 it in order. Okay?</p> <p>19 So you started by saying she ruined      20 different people's lives, and two people you named      21 are Dan -- Danny Thomas?</p> <p>22 A. Daniel Thomas.</p> <p>23 Q. Daniel Thomas and --</p> <p>24 A. And Kalina [ph] --</p> <p>25 Q. -- Jazmin --</p>	<p>1 all. That's in MEF Bates numbered document 579, five      2 eight -- excuse me, the documents you provided to      3 MEF. MEF 579 to 580.</p> <p>4 Q. So you think that --</p> <p>5 A. She says --</p> <p>6 Q. -- because she said that she doesn't --</p> <p>7 A. No, I'm giving you the totality --</p> <p>8 Q. So -- when you say that someone ruined      9 --</p> <p>10 A. Yeah, I mean, you want to have me      11 answer this I'll answer it why I give you this      12 opinion.</p> <p>13 THE COURT REPORTER: One at a      14 time. One at a time.</p> <p>15 BY MR. CARSON:</p> <p>16 Q. When you say that someone ruined      17 someone's life, that has a pretty specific meaning,      18 so --</p> <p>19 A. Yeah --</p> <p>20 Q. -- why is Caitriona Brady's life ruined      21 today?</p> <p>22 A. So it's because of the following      23 messages that I understand to be the totality of how      24 Ms. Barbounis has eventually led Brady to be in a      25 position that has really not done so well for her</p>

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1	life. I can continue, Mr. Carson, if you would like	1	allegation, but we can get there. So you write --
2	me to.	2	Q. Her complaint -- Mr. Roman, slow down.
3	Q. Do you think Ms. Brady would say that	3	Her complaint alleges no sexual harassment
4	she ruined her life?	4	whatsoever.
5	A. I think that Ms. Brady speaks out of	5	A. Ms. Brady never alleged sexual
6	one side of her mouth when she's in testimony and	6	harassment against me? That's news to me,
7	perjures herself and then when she's actually	7	Mr. Carson.
8	speaking with her friends like we see in her text	8	Q. Well, then you didn't read her
9	exchanges with Delaney Yonchek, the truth comes out.	9	complaint, Mr. Roman.
10	And if you had reviewed the messages, and maybe you	10	A. What you're saying -- you just said
11	did, maybe you didn't, between Ms. Yonchek and	11	Caitriona Brady's complaint does not allege sexual
12	Ms. Brady, we would understand what they actually	12	harassment against me?
13	think about Lisa Barbounis and how they've had a	13	Q. That's correct.
14	negative detrimental effect on their life, and, more	14	A. Okay. That's news to me. Like, let's
15	than that, how Lisa introduced Ms. Brady to you,	15	go to the complaint and see what's going on with it.
16	Mr. Carson, and then led her to be in a legally	16	Let's go to the EEOC filing --
17	compromising position where she might get sued	17	Q. We're starting to have a conversation
18	because of your malpractice, but we can get into that	18	and not a question-answer --
19	if you really want to go into it. I mean, I don't	19	A. I'm just saying, you made a statement
20	think Brady would have met you without Lisa	20	and I saw it as the form of a question, and I'm
21	Barbounis, but correct me if I'm wrong.	21	trying to get to it.
22	Q. Why is Caitriona Brady going to get	22	Q. So we don't drive the court reporter
23	sued?	23	crazy let's just try not to talk over each other.
24	A. Well, I'm not saying she's not -- she's	24	A. Sure.
25	in a legally compromising position that may lead her	25	Q. It's getting late and it's Friday. I'm
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1	to being sued, but that I guess is something --	1	sure everyone is tired.
2	Q. Sued for what?	2	Here, I want to do this quickly, so I'm
3	A. -- that calls for a legal conclusion.	3	just going to show it to you just to get -- so first
4	That's something that I think -- well, if we actually	4	amended complaint, filed second amended complaint --
5	go into the conclusion on everything, in that case,	5	all right.
6	Mr. Carson, you --	6	A. Right. Mr. Carson, this is the second
7	Q. Sued -- just sued for what?	7	complaint. There's also a first complaint. We have
8	A. I'm getting there in a second. I don't	8	to --
9	know the legal term for it, but I'll give you the	9	Q. They're all the same, but --
10	general characterization.	10	A. -- look at the complaints.
11	Q. What's the nonlegal term?	11	Q. -- the -- the only difference in the --
12	A. You wrote in Ms. Brady's complaint that	12	do you see the first one, first -- this is the first
13	I allegedly sexually assaulted Caitriona Brady.	13	amended --
14	Q. That's just flat out not true.	14	A. So let's go through this and then we
15	A. Mr. Carson, we can go to the complaint	15	can look at the second one.
16	if you would like to and I'll tell you what I'm	16	Q. This is all the legal stuff in the
17	talking about.	17	case, but --
18	Q. I mean, we -- look, it's a waste of	18	A. Seems like there's a lot of files to
19	time because I know exactly what I wrote. Would you	19	review.
20	like me to --	20	Q. Yeah. Just -- all the allegations in
21	A. Okay.	21	the amended complaint are in the first complaint.
22	Q. -- show it to you, though?	22	There's -- the amended complaint has more, not less,
23	A. I would love to see it. It's in I	23	so --
24	believe the fourth charge that you offer on Brady,	24	A. Mr. Carson, I have an experience where
25	either in the first allegation or the second	25	you say --

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1	Q. I want to -- look, every place where it	1	four minutes ago where you said Caitriona Brady never
2	says sex it says discriminated based on her sex and	2	accused me of sexual harassment, then you showed me a
3	gender, right? Discriminated based on her sex and	3	complaint where she accuses me of sexual harassment
4	gender, sex and gender, sex and gender. It doesn't	4	and you're attributing it to a typo. Mr. Carson, the
5	say sexual harassment anywhere in her complaint.	5	law does not allow for typos. You made my
6	A. We have to go -- we have to go to her	6	organization spend hundreds of thousands of dollars
7	deposition to see that --	7	defending itself against a complaint which resulted
8	Q. Her deposition doesn't allege that	8	in accusations against me of harassment because of
9	either.	9	your typo. That my dear Mr. Carson is something
10	A. It does allege that. We can go to the	10	where I find to be reprehensible and worthy and
11	history of the deposition that took place. Here we	11	meritorious of you being sued for vexatious conduct,
12	go. Gregg Roman's continuous campaign of sexual	12	for liability which comes out of an abuse of civil
13	harassment. What do you call that, Mr. Carson?	13	proceedings, perhaps under the Dragonetti Act, and
14	Q. Mr. Roman, read it all.	14	more than that, more than that, you just acted in
15	A. Far beyond the 2018 statute of	15	such a way where you found yourself in front of the
16	limitations that did not end until November 2018.	16	court to be sanctioned not once on July 6th but
17	Accordingly, plaintiff claims violations of the	17	twice.
18	continuing violations doctrine. You're claiming that	18	Q. Mr. Roman, you don't want to start
19	there is a continuing violation doctrine of sexual	19	talking about -- that's not going to help your case
20	harassment under sexual harassment laws. Mr. Carson,	20	to talk about.
21	you have to --	21	A. Mr. Carson, you paid my organization --
22	Q. It's a typo.	22	Q. Mr. Roman --
23	A. -- you have -- it's a typo.	23	A. Or not paid. You reimbursed my
24	Mr. Carson, you just represented to me that Caitriona	24	organization --
25	Brady did not sexually harass --	25	Q. -- it's not -- not going to help you --
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1	Q. Mr. Roman --	1	A. -- over \$5,000 in fees --
2	A. Hold on. Hold on. Hold on. I'm	2	Q. I'm trying to help you right now.
3	telling you what I see here.	3	A. Don't tell me what helps me, Mr.
4	Q. I know you're getting excited,	4	Carson --
5	Mr. Roman.	5	Q. It's not going to --
6	A. I am excited because you just told me	6	A. -- I'm trying to help you.
7	that your client didn't accuse me of sexual	7	THE COURT REPORTER: Can't hear
8	harassment and you just showed me a document that	8	either of you. Can't hear either of
9	accuses me of sexual harassment.	9	you.
10	Q. I know, but do you notice the	10	BY MR. CARSON:
11	difference between her complaint and the others is	11	Q. You got to stop. I'm trying to --
12	that they all characterize it as discrimination based	12	A. Mr. Carson --
13	on sex and gender, sex and gender --	13	Q. I'm actually trying to help you right
14	A. Mr. Carson, Mr. Carson, the way in	14	now.
15	which a lawyer speaks out of both sides of his mouth	15	A. You can help me as much as you would
16	is not something that I profess to be an expert in.	16	like.
17	Q. Her complaint --	17	Q. It's not -- it's not going to --
18	A. What I can tell you --	18	A. You can help me as -- you can help me
19	Q. Just slow --	19	as much --
20	A. -- is what you said -- what I can tell	20	Q. -- help you to sit here and --
21	you --	21	A. -- you can help me as much as you would
22	Q. Slow down. Slow down.	22	like, but, Mr. Carson, if you'll just go to paragraph
23	A. What I can tell you --	23	--
24	Q. Her complaint --	24	Q. Mr. Roman, I'm asking you --
25	A. -- is what you said to me approximately	25	A. Okay. I'm trying to just -- I'm trying

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1	to get here.	1	A. -- admitted under oath didn't happen.
2	Q. There's no question --	2	Q. -- sexual assault, Mr. Roman?
3	A. I'm sorry. I'm going to take a -- I'm	3	A. 364 and 366, second amended complaint
4	going to take a breath. I'm going to take a breath.	4	and first amended complaint --
5	Okay?	5	Q. 364 of the what?
6	THE COURT REPORTER: This is --	6	A. 364 of the second amended complaint and
7	okay. Stop. Please.	7	366 in the first amended complaint. Is that also a
8	THE WITNESS: I'm going to breathe	8	typo?
9	in. I'm going to drink some water. I'm	9	Q. 364 of the second amended complaint.
10	going to calm down. Okay?	10	A. Correct.
11	MR. GOLD: Why don't we take a	11	Q. Defendant Middle East Forum breached
12	five-minute break.	12	its duty of care and this directly caused the sexual
13	THE WITNESS: Do you want to take	13	assault of plaintiff Caitriona Brady, yes, yeah, it
14	a break? Take a break.	14	is a typo actually.
15	THE VIDEO SPECIALIST: We're off	15	A. So you made a typo in your complaint
16	the record. It's 5:47 p.m. Eastern.	16	accusing me of sexual assault.
17	(A brief recess was taken.)	17	Q. Your client -- your lawyer --
18	THE VIDEO SPECIALIST: It's 5:59	18	A. I don't have a client.
19	p.m. and we're back on the record.	19	Q. Your lawyers understood the entire time
20	MR. CARSON: Yeah, for the record,	20	we've litigated this case that there was never a
21	Mr. Gold, when you give your -- when you	21	sexual assault --
22	tell your client what to say during a	22	A. Mr. Carson, this is what I understand.
23	deposition in the middle of a deposition	23	I understand that you filed a public document --
24	you should put yourself on mute.	24	Q. I didn't ask -- I didn't ask a question
25	Everyone can hear you giving your client	25	yet.
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1	advice.	1	A. Okay. You asked me where it says it, I
2	BY MR. CARSON:	2	told you where you said it, you just read it, it says
3	Q. But to continue the deposition,	3	that you accused me of sexual assault --
4	Mr. Roman, can you hear me?	4	Q. There is no question on the record.
5	A. Yes.	5	This isn't a conversation.
6	Q. Do you understand sitting here today	6	A. I'm not saying --
7	that neither Caitriona Brady nor Delaney Yonchek ever	7	Q. It's not a conversation.
8	accused you of sexual assault or sexual harassment?	8	A. I took that as a question. I apologize
9	A. I would point you to Paragraph 364 in	9	if I mischaracterized your statement.
10	the second amended complaint of Ms. Brady	10	MR. CAVALIER: I am going to state
11	allegations --	11	for the record that your categorization
12	Q. Yeah, did you read --	12	of what Mr. Roman's lawyers understood
13	A. -- and Paragraph --	13	throughout the entirety of this case is
14	Q. -- the rest of the complaint?	14	inaccurate.
15	A. -- and Paragraph 366 of the first	15	MR. CARSON: It's not inaccurate
16	amended complaint, and if you would like me to be	16	at all. You guys didn't ask one
17	able to comment on that we can read the paragraphs --	17	question at her deposition about a
18	Q. No, I don't need you to comment. Do	18	sexual assault.
19	you understand that the rest of the complaint alleges	19	MR. CAVALIER: That's false.
20	sex and gender discrimination throughout?	20	MR. CARSON: No, it's not. I'm
21	A. I understand in part it alleges sex and	21	going to continue, though.
22	gender discrimination, but it also alleges sexual	22	BY MR. CARSON:
23	harassment and sexual assault, two things which your	23	Q. So to continue this -- this deposition,
24	client --	24	so after the AIPAC conference in -- strike that.
25	Q. Where does it allege --	25	After the trip to Israel that you made

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<p>1 sure Daniel Pipes didn't know about, when did you get      2 back to Philadelphia?</p> <p>3 A. I don't remember the exact date, Mr.      4 Carson.</p> <p>5 Q. And what was the month?</p> <p>6 A. Mr. Carson, I went on trips which took      7 me overseas and outside of Philadelphia over a      8 hundred days in 2018.</p> <p>9 Q. Well, approximately what month.</p> <p>10 A. I don't remember, Mr. Carson.</p> <p>11 Q. Well, when did you go to Israel with      12 Ms. Barbounis?</p> <p>13 A. Well, I stayed in Israel after their      14 departure, so I don't remember when I came back.</p> <p>15 Q. You didn't fly back with Ms. Barbounis?</p> <p>16 A. No, Mr. Carson.</p> <p>17 Q. When did you fly back?</p> <p>18 A. I don't remember, Mr. Carson.</p> <p>19 Q. Well, what month was it when you went?</p> <p>20 A. March, Mr. Carson.</p> <p>21 Q. It was March of what?</p> <p>22 A. 2018, Mr. Carson.</p> <p>23 Q. Okay. So were you back in April?</p> <p>24 A. I may have been back in Philadelphia      25 sometime between March and April of 2018 -- actually,</p>	<p>1 Q. It was a yes or no question. Did you      2 get back in April 2018?</p> <p>3 A. Well, if I'm talking about the sexual      4 harassment seminar that I participated in in April      5 2018 --</p> <p>6 Q. I'm not asking you about that.</p> <p>7 A. -- that means that I was back.</p> <p>8 Q. Okay. So you participated -- yes or      9 no, you participated in the sexual harassment seminar      10 in April 2018; is that correct?</p> <p>11 A. That's correct.</p> <p>12 Q. Did you work in Philadelphia in May of      13 2018?</p> <p>14 A. There may have been days that I was in      15 the office, there may not have been.</p> <p>16 Q. Well, at that time you were permitted      17 to go to the office whenever you wanted, correct?</p> <p>18 A. Right, but I don't know if I was in the      19 office in May of 2018. I'm sure there was days that      20 I was there. It was actually when we had the      21 planning discussions around Tommy Robinson and his      22 rally in late May of 2018, that's when I authorized      23 Lisa and Tricia to travel to London. So, yes, I was      24 in Philadelphia at least once in May of 2018.</p> <p>25 Q. You were in Philadelphia quite a bit in</p>
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<p>1 yes. Actually yes. In April of 2018 the Middle East      2 Forum held a sexual harassment seminar that was led      3 by -- I specifically remember this. It was led by      4 Marnie Meyer. She had brought in a New Jersey state      5 approved sexual harassment guide or whatever. I      6 specifically remember Lisa Barbounis was there in the      7 conference room. Tricia McNulty was there in the      8 conference room. Brady, I don't know if she was      9 working for us yet. Yonchek I think may have been      10 working for us. And Marnie Meyer held the sexual      11 harassment seminar. All the staff invited from all      12 over the country was either participating in the      13 office in Philadelphia or via Skype for business, and      14 there was an element there where I said members of      15 MEF staff -- I'm paraphrasing this now to the best of      16 my recollection -- if there are any incidents of      17 sexual harassment that you are aware of or if you      18 ever become aware of them, this is the following      19 procedure of what you have to do, and this is also      20 codified in our personnel manual.</p> <p>21 Q. Mr. Roman, you do understand that the      22 question I asked you is when did you get back and      23 then I said did you get back in April.</p> <p>24 A. Well, I'm saying what happened is when      25 I got back.</p>	<p>1 April and May of 2018, correct?</p> <p>2 A. I don't know about that      3 characterization, Mr. Carson. I have to check my      4 calendar.</p> <p>5 Q. Where do you think you were?</p> <p>6 A. Well, I traveled to -- when is this,      7 April of 2018? I think I was in Hawaii for three      8 weeks. I think I was in California. I was in      9 Seattle.</p> <p>10 Q. When were you in Hawaii?</p> <p>11 A. I was in Paris.</p> <p>12 Q. Just -- you're going to have to take it      13 one by one. When were you in Hawaii?</p> <p>14 A. Would it be proper for me to consult my      15 calendar so I give you the exact dates?</p> <p>16 Q. No, I mean, just --</p> <p>17 A. I can give you the exact dates.</p> <p>18 Q. All right. Fine. Look at your      19 calendar.</p> <p>20 A. Okay. Give me a second. Just have to      21 go back two years. I hope it's here.</p> <p>22 THE WITNESS: Mr. Cavalier, do you      23 have that calendar?</p> <p>24 MR. CARSON: Can't ask questions      25 of your counsel.</p>

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1	THE WITNESS: Mr. Carson, do you	1	Q. Okay. How long were you in Israel?
2	mind if I ask Mr. Cavalier to provide a	2	A. I was in -- I was in Israel for ten
3	calendar if I can't find it?	3	days in May of 2018, I was in California for eight
4	MR. CARSON: If you can't find it	4	days in May of 2018 -- so for more than half the
5	in your calendar for now, I'll just ask	5	month, at least from the calendar here, I was
6	you to produce it.	6	traveling, Mr. Carson. So the statement that I was
7	THE WITNESS: There we go. I left	7	in the office a lot in April and May of 2018 is
8	for Hawaii --	8	incorrect. I was -- had a de minimis presence in the
9	BY MR. CARSON:	9	office in April and May of 2018.
10	Q. Sometime around blank blank.	10	Q. If you can prove that with records,
11	A. I left for Hawaii on March twenty --	11	we'll definitely look at the records, so I'll ask
12	well, that was Passover, so we had the seder, I	12	that you produce all -- any and all records for
13	didn't work at all, I was in D.C. then, so I was out	13	travel between March of 2018 and November of 2018.
14	of the office starting like March 25th, Hawaii was	14	A. Yeah, to the extent that I have them,
15	through -- I was in Paris with Daniel -- I was in the	15	Mr. Carson. I also think you should -- to the extent
16	office it looks like three times in April of 2018.	16	that I have it, Mr. Carson, and also to your own
17	Q. Three -- you were where?	17	client's recollection of the travel that she booked
18	A. In Philadelphia, in the Philadelphia	18	for me during that time, I would be glad to provide
19	office, I have here three times in April of 2018.	19	that to you.
20	You characterized me as being in the office a lot. I	20	Q. Is it your deposition testimony today
21	wouldn't call three times a lot, Mr. Carson.	21	under oath that my client booked all your hotel rooms
22	Q. Well, do you have any proof that you	22	for your travel?
23	were away during these trips?	23	A. No, it's not.
24	A. Yes, I probably have plane tickets, I	24	Q. So why would she know about your
25	probably have the hotel reservations that Lisa	25	vacations then?
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1	Barbounis booked for me, I probably have --	1	A. Well, she controlled my calendar,
2	Q. It was a yes or no question.	2	Mr. Carson. I would book the hotel, she would put it
3	A. -- travel records.	3	on the calendar.
4	Q. It was a yes or no question.	4	Q. Okay.
5	A. Yes, and, by the way, Lisa's six month	5	A. She was my assistant or what we call
6	review took place on April 19th, 2018.	6	the executive liaison.
7	Q. And you were in Philly for that?	7	Q. Okay. You mentioned that Lisa
8	A. I was, and I was also in Philadelphia	8	Barbounis went to London around March of 2018? April
9	for the sexual harassment seminar that took place on	9	--
10	-- it was 10 a.m. on April 17th, 2018.	10	A. No, Mr. Carson.
11	Q. Say that date again?	11	Q. -- 2018?
12	A. 10 a.m., April 17th, 2018.	12	A. No, Mr. Carson.
13	Q. How about in May 2018?	13	Q. Where did she go?
14	A. May -- sorry, I have to correct myself,	14	A. When did she go where, Mr. Carson?
15	Mr. Carson. Ms. Barbounis's review was not on April	15	Q. Where did she go to London?
16	19th. It was on May 3rd, 2018. My apologies.	16	A. Where? She went to London. That's
17	Q. So you were in the office on May 3rd,	17	where she went.
18	2018, correct?	18	Q. Right. When did she go to London?
19	A. Yeah.	19	Sorry.
20	Q. What about June and July, you were in	20	A. She's been to London multiple times,
21	the office June and July, right?	21	Mr. Carson.
22	A. No, I wasn't, Mr. Carson, not that	22	Q. Talking about in April of 2018.
23	much. I was traveling to Israel, to California. I	23	A. Ms. Barbounis to the best of my
24	actually spent -- I spent a good amount of my time in	24	knowledge was not in London in April of 2018,
25	May in Israel as well.	25	Mr. Carson.

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1	Q. Was she there in May of 2018?	1	Q. Did she ever --
2	A. No, Mr. Carson.	2	A. Marnie Meyer -- Marnie Meyer --
3	Q. Was she there in June of 2018?	3	Q. It's a yes or no question.
4	A. I believe so, Mr. Carson.	4	A. -- disagreed -- I'm answering your
5	Q. Okay. Was that the first time she went	5	question, Mr. Carson.
6	there?	6	Q. My question is, did she ever work in
7	A. I don't know, Mr. Carson, if she	7	the role of deputy chief of staff in her life for the
8	traveled to London before June of 2018.	8	Middle East Forum?
9	Q. Well, related to her work at the Middle	9	A. Her responsibilities --
10	East Forum is that the first time she went there?	10	Q. It's a yes or no question.
11	A. To the best of my knowledge, yes, Mr.	11	A. Mr. Carson, it's more complicated than
12	Carson.	12	that.
13	Q. Okay. Why did she go there?	13	Q. Was she ever the deputy chief of staff?
14	A. Why did she go to London?	14	Why is that hard for you to answer?
15	Q. Yeah.	15	A. We talked about this -- we talked about
16	A. Well, there's a few ways to answer	16	this at the beginning of the deposition. Names,
17	that. Why did the organization send her or why did	17	titles, and responsibilities at MEF are all relative
18	she go? I can't answer the reasons why she	18	to the position that someone has according to the day
19	personally --	19	that they had that position.
20	Q. Best of your ability, okay, why did she	20	Q. Well, was she --
21	go to London in connection with her employment at the	21	A. She started off --
22	Middle East Forum?	22	Q. Mr. Roman --
23	A. So she went -- she went for two	23	THE COURT REPORTER: I can't hear
24	reasons. The first reason of a personal nature was	24	you.
25	to start to be what I consider to be a year and a	25	BY MR. CARSON:
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1	half fraud she enacted against MEF, and the second	1	Q. -- I'm going to ask the question,
2	reason is because she was charged with overseeing a	2	you're going to answer --
3	tens of thousands of dollar grant that was given to	3	A. I'm answering your question.
4	the convicted criminal Daniel Thomas that she had	4	Q. No, you're not. You're interrupting
5	suggested we give that money to.	5	and you're causing problems with the court reporter.
6	Q. Who approved that -- who approved that	6	Okay? So what the question is is was she ever
7	grant?	7	afforded the position, role, title, anything, deputy
8	A. Based on the representations that Ms.	8	chief of staff?
9	Barbounis gave to me, it was approved by me, Marnie	9	A. Yes.
10	Meyer, and Daniel Pipes, of which the fiduciary	10	Q. When?
11	responsibility fell on Ms. Barbounis's lap. She had	11	A. She was afforded the responsibilities
12	been asking for more responsibility. She got it and	12	that would have gone along with the title of deputy
13	then she abused it.	13	chief of staff had she not lied and subjected herself
14	Q. You said she was an executive liaison	14	--
15	at that time, a secretary basically, correct?	15	Q. When? The answer was -- the question
16	A. She was on her track to being promoted	16	was when.
17	to a deputy chief of staff position.	17	A. Mr. Carson, I'm answering your
18	Q. Had she been promoted to deputy chief	18	question.
19	of staff?	19	Q. No, you're not. You just said yes --
20	A. She was promoted after she made false	20	Mr. Roman --
21	allegations against me.	21	A. I'm giving you my answer.
22	Q. She was demoted -- she was promoted to	22	Q. No, no, no, you're not. Because it was
23	deputy chief of staff?	23	-- I asked you when. I asked for a date.
24	A. She was on her way to being promoted to	24	A. Mr. Carson --
25	deputy chief of staff.	25	Q. Wait and let me ask the question for

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<p>1 the record and then the court reporter will type one      2 person saying the question and then your attorney's      3 welcome to object, and then you're welcome to give      4 your answer, and the answer is a date. When did Ms.      5 Barbounis assume the role deputy chief of staff?</p> <p>6 A. Mr. Carson, she did not assume the role      7 of deputy chief of staff; she assumed the      8 responsibilities of someone if they had proven      9 themselves would eventually have been on the track to      10 be promoted to deputy chief of staff.</p> <p>11 Q. And you think --</p> <p>12 A. The date would have been --</p> <p>13 Q. And you think that's the same thing?</p> <p>14 A. The date would have been --</p> <p>15 Q. You think that's a promotion?</p> <p>16 A. Hundred percent, Mr. Carson, especially      17 if you look at the correspondence between myself and      18 Ms. Barbounis, which you should have.</p> <p>19 Q. Okay.</p> <p>20 A. On May 3rd, two thousand -- I'll stop      21 answering if you would like me to.</p> <p>22 Q. Yeah, you should. I think --</p> <p>23 A. I should what, Mr. Carson?</p> <p>24 Q. So give me the date when she was given      25 the position of deputy chief of staff.</p>	<p>1 raise.</p> <p>2 A. You would have to ask her, Mr. Carson.</p> <p>3 I was not part of administration of MEF.</p> <p>4 Q. So you don't know --</p> <p>5 A. She actually did -- she did receive a      6 pay raise when she was at MEF, yes.</p> <p>7 Q. That wasn't my question. My question      8 was did she ever get a pay raise to go along with      9 these so-called responsibilities that she received      10 that made her have a deputy chief of staff title.</p> <p>11 A. She never had the title of deputy chief      12 of staff.</p> <p>13 Q. Did she ever receive a pay raise in      14 connection with the responsibilities?</p> <p>15 A. Yes, Mr. Carson.</p> <p>16 Q. When? When did she get the pay raise?</p> <p>17 A. After I was removed from the      18 administration of the organization.</p> <p>19 Q. How much was this pay raise?</p> <p>20 A. I don't know, Mr. Carson.</p> <p>21 Q. How do you know she got it then?</p> <p>22 A. Because it's in the documents afforded      23 to the litigation. I can review it and give you a      24 specific answer if you like.</p> <p>25 Q. Well, aren't you talking about an</p>
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<p>1 A. She was never given the position of      2 deputy chief of staff --</p> <p>3 Q. Okay. So give me the date when she was      4 given the responsibilities of a deputy chief of      5 staff.</p> <p>6 A. It started when she was in Israel,      7 Mr. Carson.</p> <p>8 Q. So started in March of 2018?</p> <p>9 A. Yes, and gradually she got more and      10 more responsibilities until there was a discussion in      11 early October of 2018 where Daniel Pipes informed me      12 that I was going to be eventually promoted to      13 president of the organization when he was planning on      14 retiring, and the first person that I told was Lisa      15 Barbounis.</p> <p>16 Q. Okay. Was -- did Ms. Barbounis ever      17 receive a pay raise for this position or these      18 responsibilities?</p> <p>19 A. She received a pay raise I believe in      20 November of 2018, but I wasn't part of that since all      21 of my administrative responsibilities were removed on      22 November 6th, 7th, or 8th of that year. And, by the      23 way, those responsibilities never came back while she      24 was employed at Middle East Forum.</p> <p>25 Q. I asked you did she ever receive a pay</p>	<p>1 amount of money that every single female employee at      2 the Middle East Forum received?</p> <p>3 A. Mr. Carson, I wasn't part of that      4 decision. I was out of the administration of the      5 Middle East Forum after Daniel Pipes removed me from      6 the responsibilities that were previously afforded to      7 the position of director in early November of 2018      8 and I never assumed those responsibilities until      9 Marnie Meyer left the organization in February of      10 2020, so I had a good 16-month period where I was not      11 involved in the formal administration of MEF as a      12 result of Lisa Barbounis's complaint.</p> <p>13 Q. What was her position in April of 2018?      14 She was an executive liaison, correct?</p> <p>15 A. No, her title was executive liaison,      16 but her responsibilities were incrementally given      17 more and more as month and month went by. She made      18 this very clear to us in communications in May of      19 2018.</p> <p>20 Q. She was what?</p> <p>21 A. She made it very clear and known to the      22 management of the Middle East Forum in conversations      23 with Daniel Pipes and with myself that she wanted      24 more responsibilities beyond what was originally      25 afforded to her in her job description when she was</p>

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<p>1 hired in -- it was October, November of 2017. She      2 assumed those responsibilities and were given more      3 portfolios. For instance, she was given --      4 Q. You don't have to give me a for      5 instance.      6 A. No, I'm just giving you an example so      7 you can --      8 Q. It's not necessary.      9 A. -- comparison.      10 Q. It's really not --      11 A. She was given Tommy Robinson when she      12 asked for more responsibilities. She traveled      13 internationally, she handled foreign clients, she      14 handled members of congress, members of parliament,      15 but little did we know that she was abusing those new      16 responsibilities that she got.      17 Q. How did she abuse them?      18 A. There was multiple ways.      19 Q. Give me one.      20 A. She tried to hire hackers to get      21 information from the organization.      22 Q. What hacker did she try to hire?      23 A. Well, if you look at her      24 correspondence --      25 Q. Mr. Roman, I'm not asking you to refer</p>	<p>1 THE WITNESS: -- at the beginning      2 of this deposition I'll give to you.      3 MR. CARSON: -- explain to your      4 client that he needs to put the document      5 away?      6 MR. CAVALIER: You want him to      7 have less information for the      8 deposition?      9 MR. CARSON: Jon, I'm not going to      10 ask twice. It's totally inappropriate      11 for him to be pulling out documents from      12 folders and reading them to me.      13 THE WITNESS: Mr. Carson, these      14 are documents you gave to us.      15 MR. CARSON: Jon, are you going to      16 direct your client to put the document      17 away? Yes or no?      18 MR. GOLD: Unless you need to      19 refer to a document to refresh your      20 memory.      21 MR. CARSON: You do not get to      22 refer to documents unless -- unless      23 they're exhibits that I hand you.      24 MR. GOLD: You can post them if      25 you wish.</p>
<p>1 to documents. I asked you what hacker did she try to      2 hire.      3 A. This is what I'm referring to.      4 Q. Yeah, you're not -- I need you to put      5 that down. Okay? It's not --      6 A. Why?      7 Q. -- an exhibit.      8 A. No, this is documents I brought to the      9 deposition.      10 Q. It's not an exhibit that you can -- you      11 got to stop and you got to put it down.      12 A. Well, Mr. Carson, you're asking me a      13 question --      14 Q. It's not an exhibit. Yeah --      15 A. I'm answering your question. You asked      16 me -- I'm referring to a document I brought to answer      17 that.      18 Q. You're not allowed --      19 A. Would you like me to do that?      20 Q. -- to have documents surrounding you      21 that you refer to during a deposition.      22 A. They're not surrounding me, Mr. Carson.      23 I have a few exhibits that I said --      24 MR. CARSON: Guys, can you please      25 --</p>	<p>1 THE WITNESS: Sure. I can put      2 them on the screen if you want.      3 MR. CARSON: No. No, no, no.      4 We're not looking at that document. Put      5 it away.      6 THE WITNESS: Mr. Carson, you      7 asked me when I believe Mr. -- Ms.      8 Barbounis hired a hacker to go after      9 Middle East Forum data.      10 BY MR. CARSON:      11 Q. Answer the question. When did she hire      12 a hacker?      13 A. She suggested hiring a hacker on      14 November 15th, 2018, in a conversation with Tricia      15 McNulty. She then did it again on March 4th, 2019,      16 saying we have a hacker trying to get his data from      17 Facebook as a workaround. So she's talking about a      18 hacker. She does it twice, once in November of 2018,      19 once in March of 2019. I don't believe you've given      20 us who that hacker is in your production for your      21 discovery, but I would love to know and I can offer      22 you a better answer.      23 Q. Do you even know what you're talking      24 about right now, Mr. Roman?      25 A. I'm talking about a hacker that I</p>

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1	believe Ms. Barbounis hired to try to sabotage the	1	A. -- she --
2	Middle East Forum.	2	Q. Mr. Roman --
3	Q. Mr. Roman, do you have a hard time	3	A. -- she -- she asked --
4	keeping up with your lies?	4	Q. I asked you a yes or no question. When
5	A. Mr. Carson, I'm quoting -- first of	5	you're done saying yes or no, I'll ask another
6	all, they're not lies. Second of all, I'm quoting	6	question. Okay?
7	from documents that you provided to the Middle East	7	A. Well, Mr. Carson, that is not a yes or
8	Forum in discovery. These are documents you gave to	8	no question.
9	us to review. So I'm just quoting --	9	Q. Did she go --
10	Q. My question was --	10	A. It's more complicated than that.
11	A. -- from your documents.	11	Q. -- as part of her responsibilities as
12	Q. -- do you have a hard time keeping	12	an executive liaison?
13	track of all your lies.	13	A. Yes and no.
14	A. Mr. Carson, you have to look at the	14	Q. Okay. Why do --
15	documentation, and this is I believe the ninth or	15	A. She went because she -- she volunteered
16	tenth time that you've accused me of lying throughout	16	to go. Okay? She asked for permission. And then
17	all these processes. I believe it's a violation of	17	what she did is she got a reimbursement from the
18	Rule 4 of the rules of professional responsibility	18	Middle East Forum and lied to our organization to
19	for you to make a misrepresentation on the record,	19	redirect \$5,000 in a grant that went from us to
20	and I think it's abhorrent that you're being	20	Raheem Kassam and then was paid to her husband to
21	unethical --	21	cover travel that was unapproved. So she wanted to
22	Q. What question are you --	22	go, but then she lied about covering the cost for
23	A. -- in your conduct of the procession.	23	that and then defrauded the organization out of
24	Q. -- answering right now? What question	24	\$5,000. So that's really the totality of the answer
25	are you answering right now?	25	I can provide to you. And there is text messages
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1	A. I'm answering the question that you	1	that you provided to us that proves that.
2	asked are you --	2	Q. Yeah. It's funny that you think -- all
3	Q. It's a yes or no question.	3	right. Anywho, so -- so, Mr. Roman, when she went to
4	A. -- are you aware -- are you keeping	4	Europe she went to witness a rally that -- that was
5	track of the lies. That's what you said.	5	put on because of a grant that the Middle East Forum
6	Q. Right. Are you keeping --	6	made to Danny Thomas and Tommy Robinson; is that
7	A. And I'm saying --	7	correct?
8	Q. -- track of all your lies?	8	A. That's incorrect.
9	A. I'm saying that --	9	Q. Why is it incorrect?
10	Q. Yes or no?	10	A. Because the grant wasn't made to Danny
11	A. -- number one, they are not lies --	11	Thomas and to Tommy Robinson.
12	Q. Right. I'm going to --	12	Q. Who was it made to?
13	A. -- and, number two --	13	A. The grant was made to a movement that
14	Q. -- withdraw the question. All right?	14	Ms. Barbounis said --
15	So we're going to move on now.	15	Q. What's the name of the movement?
16	A. Okay.	16	A. Well, if you want to call it an
17	Q. Mr. Roman, you said that when Lisa	17	enterprise -- I wouldn't call it a movement per se; I
18	Barbounis went to -- you said that when Lisa	18	would call it an enterprise that constituted about 15
19	Barbounis went to Europe in June of 2018 it was at	19	to 20 different people.
20	your direction, correct?	20	Q. Well, Mr. Roman, Lisa has nothing to do
21	A. She -- well, yes and no.	21	with money at the Middle East Forum, correct?
22	Q. Yes or no, did you say that?	22	A. She definitely has something to do with
23	A. Yes -- no, yes and no. What I'm saying	23	money at the Middle East Forum.
24	is --	24	Q. She does?
25	Q. No, no --	25	A. Yeah.

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1	Q. She -- so she sends wires out and she	1	those receipts to me afterwards and --
2	makes sure that the books are straight --	2	Q. She provided what receipts to you
3	A. Yes.	3	afterwards?
4	Q. -- as part of her responsibility?	4	A. The receipts that Mr. Thomas allegedly
5	A. Ms. Barbounis made a recommendation in	5	gave to Ms. Barbounis.
6	early June of 2018 to transfer tens of thousands of	6	Q. Ms. -- Daniel Thomas gave Ms. Barbounis
7	dollars to Mr. Daniel Thomas and then, as in --	7	receipts that she gave to you; is that your
8	e-mails indicate, and you'll see this was a constant	8	testimony?
9	pattern from June of 2018 until --	9	A. Right, that -- what she did was she
10	Q. I'm not --	10	said that these were receipts, and that accounted for
11	A. -- her departure --	11	a portion of the money, but the sum total of the
12	Q. -- asking you about a pattern; I'm	12	money -- if you take the total amount of money that
13	asking you --	13	came from what was given --
14	A. You're asking me if she was responsible	14	Q. Mr. Roman --
15	for money, and I'm giving you an answer.	15	A. I'm giving you an answer.
16	Q. I'm asking if she was responsible for	16	Q. No, you're not.
17	actually sending money out. Did she -- was she the	17	A. I'm giving you an answer. Yes, I am.
18	person who said, all right, I'm going to send this	18	Q. No, you're not. All right?
19	money now; is that part of her job?	19	A. There is receipts --
20	A. What she said was --	20	Q. Listen to the question before --
21	Q. Yes or no?	21	THE COURT REPORTER: One at a
22	A. -- we should send money -- what she	22	time.
23	said was -- I can't say yes or no to something that	23	BY MR. CARSON:
24	didn't happen.	24	Q. The question is, did Daniel Thomas give
25	Q. Right. Did -- was that one of her	25	receipts to Lisa that she then gave you; is that what
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1	responsibilities or did you have a bookkeeper at the	1	you're saying?
2	time who did that?	2	A. He gave partial receipts, and then he
3	A. No, she recommended the money be	3	also gave an accounting --
4	transferred. I approved --	4	Q. What is a partial receipt?
5	Q. Who did she make the recommendation to?	5	A. Okay. So I'll give you an example.
6	A. I approved that recommendation based on	6	Let's say I give you a hundred dollars. Okay? And I
7	her representations.	7	ask you to go buy a stack of books. All right? So
8	Q. Who else approved --	8	you go buy the books. They cost \$80. And then on
9	A. And then the money was sent by Marnie	9	your way back to the office you buy a Big Mac and you
10	Meyer.	10	have a \$6 Big Mac. And then you go buy a pack of gum
11	Q. Correct. Who else approved the	11	and you get something else. So you spent \$80 on the
12	recommendation? Daniel Pipes?	12	books, that's what you have the receipt for, but you
13	A. Yeah, he would approve some	13	bought yourself a Big Mac and a pack of gum but you
14	recommendations and others he wouldn't be involved	14	didn't give me those receipts. So you gave me
15	with.	15	partial receipts for 80 percent of the total that you
16	Q. Was he involved in this one?	16	were allocated and you represented that you spent the
17	A. I don't remember.	17	rest of the money on a Big Mac and on bubble gum.
18	Q. Okay. When you approved it what did	18	Now, if you're working for an organization usually
19	you approve it based on?	19	the --
20	A. I approved it based on quotes that	20	Q. So stop. I understand what you mean.
21	Daniel Thomas gave to Lisa Barbounis and then from	21	A. Hold on a second.
22	those quotes she said I believe that we should send X	22	Q. Let me ask you a question.
23	amount of money to Mr. Thomas, and I said are you	23	A. So what she did -- what he did --
24	going to be able to keep track of those receipts and	24	Q. How much money -- stop.
25	the spending, and she said yes, and then she provided	25	THE COURT REPORTER: I can't get

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1	both of you.	1	A. You want to know how much. I'm trying
2	BY MR. CARSON:	2	to give you the exact amount of how much it was.
3	Q. How much money was granted to Danny --	3	Q. Thank you. Was it 25,000? Is that
4	who was the money granted to?	4	your testimony?
5	A. The money was granted in the grant	5	A. No, it's not.
6	contract --	6	Q. Approximately 25,000?
7	Q. Just a name. Danny Thomas, right?	7	A. It was between twenty -- about 25,000
8	A. There's not a name, Mr. Carson.	8	pounds, but I don't know the dollar rate.
9	Q. Well, who did -- how was the money	9	Q. I don't care what the dollar rate is.
10	sent?	10	A. Okay.
11	A. The money was wired to a --	11	Q. Okay? It's not important. Okay.
12	Q. Where?	12	Thank you.
13	A. -- to a bank account that Lisa	13	A. Okay.
14	Barbounis provided to the Middle East Forum that she	14	Q. So 25,000 pounds. The intention was to
15	said came from Danny Thomas.	15	transfer 25,000 pounds to Danny Thomas, correct?
16	Q. Okay. So the money was sent to Danny	16	A. No, that was not the intention. The
17	Thomas's bank account, correct?	17	intention was to transfer the money to the -- the
18	A. I don't know if it was Danny Thomas's	18	individual that Lisa Barbounis represented was the
19	bank account. Ms. Barbounis said it was Danny	19	organizer of the event so that --
20	Thomas's bank account. And there was actually	20	Q. And who was that?
21	problems with the initial transfer. We sent the	21	A. -- so that vendors would be paid.
22	money overseas --	22	Q. Who was that?
23	Q. I didn't ask you any questions --	23	A. It was Danny Thomas.
24	A. -- and then --	24	Q. So then what are you talking about?
25	Q. -- anything about a transfer, I didn't	25	A. It was Danny Thomas and Kevin Carroll,
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1	ask you any questions about that.	1	it's another acquaintance of Ms. Barbounis, it was --
2	A. Sure. Sure. I'm trying to answer your	2	Q. Did the money go to two -- Mr. Roman,
3	questions.	3	did the money go to two people's accounts or one
4	Q. No, you're not, but just -- just listen	4	account?
5	to my questions. Okay? Because we're going to get	5	A. No, the account -- there was actually
6	through this.	6	two accounts that were provided.
7	So you're saying that the intention was	7	Q. Did the money -- was the money sent
8	for the Middle East Forum to send how much money to	8	from -- to two accounts, 15 and 15, 20 and 15, or did
9	Danny Thomas?	9	it all go to one account?
10	A. The exact amount I don't recall, but I	10	A. I would have to look at the books to be
11	would say it was probably around 25,000 pounds, which	11	able to tell you how many transfers were made, but I
12	I'm not sure of the conversion rate at the time. We	12	know that the initial transfer was problematic --
13	can look this up in the records. It was probably	13	Q. Who made the -- who made the transfers?
14	between --	14	A. You can ask Marnie Meyer about that.
15	Q. I don't care about the --	15	Q. Marnie Meyer made those transfers,
16	A. -- 28 and --	16	correct?
17	Q. -- conversion rate. Just give me an	17	A. At the suggestion of Lisa Barbounis,
18	amount.	18	correct.
19	A. Mr. Carson, I'm not trying to have a	19	Q. And you approved those transfers,
20	conversation; I'm trying to answer a question.	20	correct?
21	Q. Is it 25 -- it was an amount. I asked	21	A. After Ms. Barbounis represented to me
22	you for an amount. 25,000 pounds?	22	that it was going to support the rally that she went
23	A. I'm trying to give you an exact amount.	23	to.
24	Q. I don't need an exact amount. I just	24	Q. Who told her to begin working on the
25	want to know how much. 25,000?	25	Tommy Robinson campaign in the first place?

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1	A. I think that there was a discussion	1	think that?
2	where we saw that this guy --	2	A. It's not that I think it; it's that the
3	Q. I'm asking for the name of a person.	3	e-mails, text messages, and all of the communications
4	A. I'm trying to remember. I'm trying to	4	from Lisa Barbounis that you provided to us in
5	remember, Mr. Carson.	5	discovery prove that she was the center point for
6	Q. Who told her to -- you don't have to	6	that rally.
7	talk out loud. Think in your mind --	7	Q. Well, we're going to find out if that's
8	A. Okay.	8	true; aren't we, Mr. Roman? But why do you --
9	Q. -- and give us the name of a person.	9	A. I already have, Mr. Carson. I've
10	A. Okay. So I'm thinking in my mind right	10	looked at the information --
11	now.	11	Q. Mr. Roman --
12	Q. Okay.	12	A. -- you've provided to MEF.
13	A. And I'm thinking about Tommy Robinson.	13	Q. -- why do you think that? What -- you
14	Q. Who assigned Ms. Barbounis to work on	14	can't just say that's what the evidence proves. You
15	this rally?	15	sound like Donald Trump. Why? What evidence?
16	A. I believe Ms. Barbounis volunteered.	16	A. Mr. Carson, I take great exception with
17	Q. So Ms. Barbounis came to you out of	17	you trying to insult me at a deposition.
18	nowhere and said Tommy Robinson.	18	Q. Why, Mr. Roman? What evidence are you
19	A. No, it wasn't out of nowhere. The	19	talking about? Be specific. What evidence proves
20	involvement with Tommy Robinson started years before	20	that she was intimately involved with managing the
21	when we provided legal assistance to the individual	21	rally?
22	when he was found involved with some contempt	22	A. Sure. So let's start with the text
23	proceeding or some free speech case. It might have	23	messages.
24	even been before I started working at MEF.	24	Q. Just give me one piece of evidence.
25	Q. After you approved the \$25,000 and	25	A. E-mails --
1	Marnie sent it to Danny Thomas, Lisa Barbounis went	1	Q. We don't have to start anywhere. One
2	to London to oversee the rally that was put on with	2	piece of evidence.
3	that money; is that correct?	3	A. E-mails that were --
4	A. No, it wasn't \$25,000.	4	Q. All right. Give me one e-mail and tell
5	Q. Mr. Roman, I'm using the number you	5	me what it said.
6	gave me.	6	MR. GOLD: Excuse me, Mr. Carson.
7	A. I said 25,000 pounds.	7	I know it's getting late. Just let Mr.
8	Q. Right. 25,000 pounds. Good. Is that	8	Roman finish his answer and then you can
9	right then if we said pounds?	9	ask another question. All right? Go
10	A. Yeah, but, like I said, I didn't know	10	ahead.
11	the dollar amount.	11	BY MR. CARSON:
12	Q. Okay. So after Marnie transferred	12	Q. One e-mail, what did it say? Tell me
13	25,000 pounds that you approved Lisa Barbounis went	13	one e-mail. Describe it.
14	to London to see the rally that was paid for with the	14	A. Sure. So --
15	Middle East Forum grant; is that correct?	15	MR. GOLD: One question at a time,
16	A. No. Ms. Barbounis went --	16	Mr. Carson.
17	Q. She didn't go there to see the rally?	17	BY MR. CARSON:
18	A. No, she didn't go there to see the	18	Q. Go ahead.
19	rally; she went there to manage the rally.	19	A. Okay. So that was a compound question.
20	Q. To manage the rally?	20	One e-mail --
21	A. Correct. Ms. Barbounis was intimately	21	Q. Go ahead. Describe one e-mail.
22	involved in the planning of all aspects related to	22	A. Sure. So an e-mail that Danny Thomas
23	the Middle East Forum's backing of that rally that	23	-- I think he was dannythomas@tesco.co.uk --
24	took place in London in June of 2018.	24	Q. Right. Great.
25	Q. Why do you think that? Why do you	25	A. -- sent -- excuse me?

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1	<p>Q. Keep going.</p> <p>A. Okay. -- sent to Lisa Barbounis involved the deployment of buses that were to go from the midlands of England, from the Scottish border, from Sheffield, from Manchester, I think Wales was involved, and they were busing these people in from these areas that were outside of London and coming into London. Then what happened was --</p> <p>Q. I don't need to know what happened. I said to describe an e-mail.</p> <p>A. I'm giving you the e-mail description.</p> <p>Q. Right. Are you still talking about the e-mail or are you going to tell me what happened --</p> <p>A. Hundred percent I'm talking about the e-mail.</p> <p>Q. Okay. Go ahead.</p> <p>A. And the e-mail that was between Ms. Barbounis and Mr. Thomas were talking about the intricate difficulties in trying to make sure that enough people attend, so what they discussed was that there would be additional monies that Mr. Thomas suggested that Ms. Barbounis provide to what they call the lift carrier, so she's talking about in this e-mail the money that -- or not even the money, the quotes that the team she was working with in the UK</p>	<p>1 time, correct?</p> <p>2 A. I don't know.</p> <p>3 Q. Isn't it funny that you're accusing her of entering into a conspiracy with someone she didn't know?</p> <p>4 A. No, Mr. Carson. She engaged in a four-month at least intimate affair with Danny Thomas, and I think they knew parts of each other that no one else probably knew about Danny Thomas or Lisa Barbounis. This is the ultimate definition of what I would consider to be not just a conspiracy but an enterprise designed to defraud the Middle East Forum.</p> <p>5 Q. When did you find out that there might have been -- strike that.</p> <p>6 Why do you think that Danny Thomas didn't spend all the money on the rally?</p> <p>7 A. I don't know. You would have to ask Danny Thomas.</p> <p>8 Q. Well, why -- but you're alleging that, aren't you, that not all the money went to the rally?</p> <p>9 A. No, I'm not alleging that --</p> <p>10 Q. You just said partial receipts.</p> <p>11 A. I'm not alleging that, Mr. Carson.</p> <p>12 What I'm doing is I'm taking the testimony that</p>
1	<p>1 was getting from that team and then going down, but 2 in the end I don't think any money was paid directly 3 to the bus companies --</p> <p>4 Q. Why would you grant money to Danny Thomas if Ms. Barbounis was going to manage the whole thing? Why wouldn't you just let her handle it?</p> <p>5 A. Well, I did let her handle it and she recommended sending money to Danny Thomas. That's where the entire conspiracy began.</p> <p>6 Q. Did she know Danny Thomas at the time?</p> <p>7 A. She recommended him and she said she --</p> <p>8 Q. Did she know Danny Thomas at the time; yes or no?</p> <p>9 A. When -- what time are we talking about?</p> <p>10 Q. What time are you talking about?</p> <p>11 A. I'm talking about the time that Lisa Barbounis introduced me to Danny Thomas.</p> <p>12 Q. June 2018, right?</p> <p>13 A. Yeah, I can't tell --</p> <p>14 Q. Did she know him at that time; yes or no?</p> <p>15 A. I can't -- I can't represent what Ms. Barbounis's relationship was with Danny Thomas prior to when she introduced me to him.</p> <p>16 Q. Right. She didn't know him at the</p>	<p>1 Page 305</p> <p>1 Danny Thomas in part gave --</p> <p>2 Q. Danny Thomas hasn't testified,</p> <p>3 Mr. Roman.</p> <p>4 A. Okay, so the statement that Mr. Thomas made in the presence of two attorneys registered with the Pennsylvania Bar just like you are, Mr. Carson, and said in a recording. I'm also talking about a statement that --</p> <p>5 Q. I don't need you to pull up any statements. Seriously. You can put it down.</p> <p>6 A. -- you provided to -- okay. I'm just trying to refresh my memory based on the evidence that you provided to us.</p> <p>7 Q. Did you hear my question?</p> <p>8 A. Yeah, you're saying -- can the stenographer repeat the question, please?</p> <p>9 Q. I'll just say it again. I'm not going to make her do that.</p> <p>10 So my question is -- at some point in time did you learn that Danny Thomas might not have spent the entire \$25,000 on the rally?</p> <p>11 A. Mr. Carson, again --</p> <p>12 Q. Yes or no question.</p> <p>13 A. -- it wasn't \$25,000.</p> <p>14 Q. 25,000 pounds. Thank you for helping</p>

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1	me with that. Thank you.	1	Q. I don't need a list of the discovery in this case. Thank you, though.
2	A. Sure.	2	A. There's also a lot of stuff you haven't given yet, and I look forward to reading that as well.
3	Q. 25,000 pounds.	3	Q. Good luck with that.
4	A. What about it?	4	Did you ever talk to Danny Thomas before?
5	Q. At some point in time did you discover that maybe he didn't spend it all on the rally?	5	A. Yes.
6	A. Yes, I discovered that, Mr. Carson.	6	Q. Did you offer to pay him money for his -- for his testimony?
7	Q. Okay. How did you discover that?	7	A. No.
8	A. When I believe Ms. Jazmin Bishop provided me and the Middle East Forum and our attorneys with a record that constituted Ms. Barbounis's statements with Mr. Thomas from March 7th, 2019.	8	Q. Why did he say you did?
9	Q. What are you talking about?	9	A. I don't think you can ask a question which is based on a factual predicate on instances that did not exist, Mr. Carson.
10	A. Talking about --	10	Q. Well, why would he say that you offered to give him a wink and a nod when this whole thing ends?
11	Q. Talking about text messages?	11	A. Mr. Carson, I am not Danny Thomas and I can't answer that question.
12	A. No, not just the text messages; specific quote where Ms. --	12	Q. So he's lying when he says that, right?
13	Q. Are you reading from a text message?	13	A. About what, Mr. Carson?
14	A. No, I'm recollecting my memory from a piece of evidence that you gave to us.	14	Q. He's lying when he says you offered to pay for his testimony.
15	Q. Is it a text message?	15	
16	A. It's a text message you gave to us, yes.	16	
17	Q. Why do you keep saying no then? I'm	17	
18	asking you if it's a text message.	18	
19	A. I didn't say no; I'm saying that it's a	19	
20	--	20	
21	Q. You understand you're under oath, you can't say no when the answer is yes.	21	
22	A. Well, Mr. Carson --	22	
23	Q. That's called a lie.	23	
24	A. Mr. Carson, I'm not lying. What I'm saying is --	24	
25	Q. Stop perjuring yourself today.	25	
1	A. I'm not reading from a text message; I'm reading from a printout that came in discovery that you gave to us. Now, this might be an e-mail, might be a text message --	1	A. Mr. Carson, I don't believe that Danny Thomas has ever said that.
2	Q. You're holding a text message.	2	Q. I can play you the recording if you want.
3	A. This might be an e-mail, it might be a text message, and I'm quoting from it.	3	A. I appreciate to hear that, Mr. Carson.
4	Q. Did it come from an electronic communication?	4	Q. No problem. I would be happy to.
5	A. It came from something that you provided to us in discovery, yes.	5	A. Sure. Just as a point of information, do you have --
6	Q. Okay.	6	Q. You don't have to say -- there is no question pending. No points of information are required. Thank you, though.
7	A. But there is all kind of things you gave to us. You gave to us WhatsApp, you gave to us text messages, you gave to us e-mails.	7	A. -- a transcript that goes along with the recording.
8		8	Q. I'm sure there is.
9		9	THE COURT REPORTER: Okay. I'm
10		10	going to go off the record for the
11		11	recording.
12		12	MR. CARSON: No, we don't have to go off the record. This can be on record.
13		13	THE COURT REPORTER: I mean when you play it.
14		14	MR. GOLD: You would have no shot at stenographically recording this thing.

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1	(Audio played.)	1	Barbounis I believe he's credible, yes.
2	BY MR. CARSON:	2	Q. You think he's a credible person,
3	Q. He said I'm fuckin' testifying,	3	period.
4	brother, under oath. I'm taking her to fuckin' town.	4	A. I do. I also believe --
5	A. Yeah.	5	Q. You do.
6	Q. Does that sound like someone who is	6	A. -- that --
7	credible?	7	Q. No, no, I don't need to know what else
8	A. Yes, a hundred percent, especially	8	you believe. The question was about Daniel Thomas
9	because if we go back to earlier question --	9	and your feelings on his credibility.
10	Q. You think Daniel Thomas is credible?	10	A. When Mr. Thomas is speaking about Lisa
11	A. Well, in --	11	Barbounis --
12	Q. I asked you a yes or no question.	12	Q. Mr. Roman, there is no question
13	A. -- in reference --	13	pending. None.
14	Q. I don't need to know --	14	A. You didn't let me finish because you
15	A. In reference --	15	cut me off on the last --
16	THE COURT REPORTER: Please one at	16	Q. I asked you a yes or no question.
17	a time.	17	There is nothing to finish.
18	BY MR. CARSON:	18	A. I would like to --
19	Q. Gregg, stop. Seriously. I'm asking	19	Q. Do you think he's credible.
20	you yes or no questions. That's it.	20	A. -- just put -- I would like to --
21	A. No, Mr. Carson.	21	Q. I'm going to play the rest of the
22	MR. GOLD: Hold on. Ask the	22	recording now.
23	question, let him answer, then you can	23	A. You just said do you think he's
24	follow with another question.	24	credible --
25	BY MR. CARSON:	25	Q. Yeah, and you said I do.
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1	Q. Do you think Daniel Thomas is credible,	1	A. -- then you said -- then you said
2	yes or no?	2	period, then I said --
3	A. In what terms, Mr. Carson? He's	3	(Audio played.)
4	probably --	4	THE WITNESS: -- Mr. -- can I
5	Q. Do you think he's a liar? You don't	5	finish my --
6	know what credible means?	6	BY MR. CARSON:
7	A. Mr. Carson --	7	Q. No.
8	Q. No, no, no, I -- do you know what	8	A. -- question?
9	credible means?	9	Q. There is no question pending.
10	A. Mr. Carson --	10	(Audio played.)
11	Q. No, no.	11	THE WITNESS: Mr. Gold, can you
12	A. -- the answer is much more complicated	12	please --
13	than that.	13	(Audio played.)
14	Q. Mr. Roman, stop. I'm not asking you to	14	BY MR. CARSON:
15	give me a complicated response to a definition of a	15	Q. I'm taking her to fuckin' town, that's
16	word. I can read you the definition of the word	16	what he says, right?
17	credible if you would like me to. Do you want -- do	17	A. Then he says then she ruined my life.
18	you need me to do that?	18	So, yeah, that's what he said.
19	A. So as many cases show in this, this	19	(Audio played.)
20	case is much more complicated than just a yes or no	20	THE WITNESS: Can we stop there
21	question affords to.	21	for a second?
22	Q. Do you think that Daniel Thomas is	22	BY MR. CARSON:
23	credible, yes or no?	23	Q. No.
24	A. When Danny Thomas is speaking about the	24	A. Okay. I can't comment if you won't let
25	pain inflicted upon him and what happened with Lisa	25	me give the piece by piece if I don't see any written

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1	transcript in front of me.	1	MR. GOLD: What are you doing?
2	Q. Mr. Roman, there is no question	2	You're talking to yourself now, Carson?
3	pending. You're just talking for no reason.	3	One question at a time and let him
4	A. And you're playing a tape that I can't	4	answer the question.
5	comment on.	5	BY MR. CARSON:
6	MR. GOLD: (Indiscernible.)	6	Q. Yes or no?
7	THE COURT REPORTER: I can't hear	7	A. Can you read back the question?
8	you, Mr. Gold.	8	Q. Did you ever give him a little wink and
9	MR. GOLD: What is he -- if there	9	tell him when this is all over we're going to thank
10	is no question pending, what is he	10	you?
11	doing?	11	A. Mr. Carson, that's a compound question.
12	MR. CARSON: Is everyone going to	12	One question at a time, please.
13	stop talking so I can play this? Thank	13	Q. No, it's not a compound question. Did
14	you.	14	you do that?
15	(Audio played.)	15	A. Did you give him a wink, that's one
16	BY MR. CARSON:	16	question --
17	Q. He gave me a little wink and said when	17	Q. No, I'm not --
18	this is all over we'll thank you.	18	A. -- and then did you do something else.
19	A. Yeah.	19	Q. I'm asking if you did that, yes or --
20	Q. What did he mean by that?	20	A. Do what?
21	A. I don't know, Mr. Carson. I'm not	21	Q. -- no? Did you give him a little wink
22	Mr. Daniel Thomas. But I can tell you what he may	22	and did you tell him when this is all over we're
23	mean.	23	going to thank you. That's one question. Did you do
24	Q. Did you give him a little wink and tell	24	that?
25	him when this is all over we're going to thank you?	25	A. No, I had him meet a man named Matthew
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1	A. No, Mr. Carson, I never told him that.	1	Altass, who is the premier e-discovery expert in the
2	Q. Okay. So he's lying then.	2	United States -- sorry, not in the United States; in
3	A. No, he may not be lying. What he may	3	the United Kingdom --
4	be talking about is a man named Matthew Altass,	4	Q. Mr. Roman, I don't need to know --
5	A-l-t-a-s-s.	5	A. Mr. Carson --
6	Q. He said that -- he said I talked to	6	MR. GOLD: Let him finish his
7	Gregg Roman, he gave me a little wink and told me --	7	answer.
8	A. Yeah.	8	BY MR. CARSON:
9	Q. -- when this is all over we're going to	9	Q. Go ahead.
10	thank you. Did you --	10	A. -- in order to assure the chain of
11	A. Exactly.	11	custody of Mr. Thomas's two electronic devices of
12	Q. -- do that? Did you do that?	12	which a picture should have been provided to you in
13	A. No -- Mr. Carson, I'm answering your	13	discovery -- if they weren't, I'm asking Mr. Cavalier
14	question.	14	to please give that to him -- so that the purity of
15	Q. No. Mr. Roman --	15	his testimony and the purity of his evidence wouldn't
16	A. A man --	16	be questioned such a way as doing right now.
17	Q. -- did you do that? Did you give him a	17	Immediately after Mr. Thomas agreed to testify at the
18	little wink and did you tell him when this is all	18	U.S. Embassy in London the following happened, which
19	over we're going to thank you.	19	I think was an example of Lisa Barbounis taking part
20	MR. GOLD: One question at a time.	20	in witness tampering --
21	One question at a time. And let him	21	Q. I don't want to hear about your
22	answer the question.	22	speculation about my client.
23	BY MR. CARSON:	23	A. It's not speculation, Mr. Carson. I
24	Q. You never did that, right? That's your	24	have sources that I'm willing to share with you right
25	testimony.	25	now. Would you like to hear that?

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1	Q. I'm not interested.	1	Roman?
2	A. Okay.	2	THE WITNESS: No, I'm not,
3	Q. Really not. Thank you, though.	3	Mr. Gold.
4	A. Okay. Well, then I can't --	4	MR. CARSON: Yeah, you are.
5	Q. When is the last --	5	MR. GOLD: Finish your answer
6	A. -- give you a complete answer on why I	6	then, Mr. Roman.
7	think that --	7	MR. CARSON: It was a yes or no
8	Q. You --	8	question and you answered it.
9	A. -- his --	9	BY MR. CARSON:
10	Q. Through your lawyers you can make	10	Q. When is the last time -- when is the
11	whatever arguments you want. I'm not doing that with	11	last time you spoke to Daniel Thomas?
12	you right now.	12	MR. GOLD: Mr. -- let him answer
13	A. It's not an argument, Mr. Carson. It's	13	the previous question and then he'll
14	my belief on what he meant when he --	14	give you the answer to that question.
15	Q. Mr. Roman, you got to stop.	15	Go ahead.
16	A. -- said what you represented he said.	16	MR. CARSON: There is no question
17	Q. You got to stop. Seriously.	17	pending.
18	MR. GOLD: Mr. Carson, you're not	18	MR. GOLD: There is a question
19	-- he's trying to complete his answer --	19	pending because there's an answer
20	MR. CARSON: There's no --	20	pending. The answer is pending -- yeah,
21	MR. GOLD: -- you don't like --	21	there's no question, it's the answer
22	MR. CARSON: There's no question	22	that's pending.
23	pending.	23	MR. CARSON: There is no answer
24	MR. GOLD: -- the response, you're	24	pending.
25	trying to cut him off. Let him just	25	MR. GOLD: Let him finish his
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1	finish his answer --	1	answer. Go ahead. Go ahead, Mr. Roman.
2	MR. CARSON: There's absolutely no	2	THE WITNESS: Can the stenographer
3	question pending right now.	3	please read back the question?
4	MR. GOLD: He's finishing his	4	MR. CARSON: No, she's not going
5	answer --	5	to read back the question. She's not
6	MR. CARSON: No, he's not.	6	doing that. You're not doing that to
7	MR. GOLD: -- to your last	7	the stenographer right now.
8	question.	8	MR. GOLD: I think you were at the
9	BY MR. CARSON:	9	part of talking about this electronic
10	Q. You can answer this question. When is	10	e-discovery expert in the UK, that's
11	the last time you spoke to Daniel Thomas?	11	where you were.
12	MR. GOLD: We're going to let	12	THE WITNESS: Okay. So --
13	Mr. Roman finish the answer and then you	13	BY MR. CARSON:
14	can ask your next question.	14	Q. Just do what you got to do.
15	MR. CARSON: Answer to what	15	A. Okay. So you're talking about this
16	question?	16	wink and whatever. Okay? So what we did was --
17	MR. GOLD: The question about a	17	Q. All I asked you was did you do it.
18	wink of the eye, whatever you're going	18	A. No, Mr. Carson, I'm trying to finish my
19	after --	19	answer.
20	MR. CARSON: He already answered	20	MR. GOLD: Mr. Carson, take the
21	that question.	21	food out of your mouth if you're going
22	MR. GOLD: He's not done answering	22	to ask a question.
23	the question.	23	Go ahead, Mr. Roman.
24	MR. CARSON: He is.	24	THE WITNESS: Okay. So when
25	MR. GOLD: Are you done, Mr.	25	Mr. Thomas was engaged in conversations

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1	with Tommy Robinson -- when Daniel	1	Roman. I said did you -- did you do that.
2	Thomas was engaged in conversations with	2	A. So when Mr. --
3	Tommy Robinson, I believe that's when	3	Q. So why are you telling me about drug
4	you were able to actually get that	4	deals? What the hell are you doing?
5	recording, he received five phone calls	5	A. I'm trying -- I'm trying to give the
6	from an associate of his named Si, S-i.	6	answer, Mr. Carson.
7	In August when Danny Tommy was present	7	Q. No. No, no, no, no. I'm putting a
8	these calls all came from an American	8	stop --
9	phone number. They called Si and Danny	9	A. So --
10	Tommo got the phone call. Then he	10	Q. -- to this right now. I'm putting a --
11	started receiving calls from a Qatari	11	A. Hold on.
12	registered number and a visit from the	12	Q. -- stop to it. We're not going to do
13	UK counterterrorism police in September	13	this. You're done. You're done that answer.
14	of 2020. This was all around the time	14	A. I'm done -- I'm done what? I'm not
15	that a man named Darren Perry, a former	15	done the answer, Mr. Carson.
16	British serviceman who had been with	16	Q. Yeah, you are.
17	Tommy Robinson in the English Defence	17	A. I'll finish with one sentence. Is that
18	League and was close to his crew,	18	fair?
19	started being around a drug deal that	19	Q. No.
20	went wrong where because of Mr. Thomas	20	A. Okay.
21	Perry lost a huge amount of money. As a	21	Q. I'm going to ask you the next question
22	result, the same threats that were made	22	now. The next question is --
23	against Mr. Jordan James, another woman	23	A. Sure.
24	named Ashley, and so on, ended up being	24	Q. -- when is the last time you spoke to
25	the same things that happened to	25	Daniel Thomas?
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1	Mr. Thomas. The people who were	1	MR. GOLD: What's the next
2	involved with the threats against him	2	question?
3	include Steven Clark, Gary Paige, Andy	3	BY MR. CARSON:
4	Harrison --	4	Q. When is the last time you spoke to
5	BY MR. CARSON:	5	Daniel Thomas?
6	Q. What question --	6	A. The last time I spoke with Daniel
7	A. -- Nick Walsh --	7	Thomas was after Lisa Barbounis engineered the
8	Q. -- are you answering right now? What	8	quieting of the witness by Tommy Robinson.
9	are you telling me?	9	Q. When is the last time you spoke to
10	A. -- Jamie McClintock.	10	Jazmin Bishop?
11	Q. What are you telling me?	11	A. Last time I spoke with Jazmin Bishop
12	A. So when Mr. -- when Mr. Thomas --	12	was after Lisa Barbounis engineered the quieting of
13	Q. What question are you answering right	13	her as a witness.
14	now? What -- I don't even know what you're telling	14	Q. When is the last time, I'm sorry?
15	me.	15	A. After Lisa Barbounis threatened to kill
16	A. The wink --	16	Jazmin Bishop and after she arranged the quieting of
17	Q. You're just babbling.	17	the witness through Tommy Robinson.
18	A. The wink -- the wink question, Mr.	18	Q. Have you ever asked for that money
19	Carson.	19	back? How much --
20	Q. The question was did you say that.	20	A. Yes, Mr. Carson.
21	A. So --	21	Q. -- money do you -- how much money do
22	THE COURT REPORTER: One at a	22	you think was stolen by Daniel Thomas?
23	time.	23	A. I believe that -- if you look at the
24	BY MR. CARSON:	24	contract that was signed --
25	Q. That was the question I asked you, Mr.	25	Q. I just need an amount. How much?

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1	A. -- between -- the entirety of the money	1	a result of him --
2	was defrauded from MEF so we will be demanding in a	2	Q. Mr. --
3	future legal action the full amount of money -- and	3	A. -- defrauding us.
4	actually it was actually conveyed from him.	4	Q. Mr. Roman, I didn't ask you how much
5	Q. How much?	5	money you're trying to recover from my client in
6	A. If you read -- if you read --	6	litigation. I said how much money --
7	Q. How much money?	7	A. I'm not talking about your client; I'm
8	A. -- the complaint --	8	talking about Daniel Thomas.
9	Q. That's the question. How much?	9	Q. Can I please finish the question?
10	A. Probably --	10	A. Sure.
11	THE COURT REPORTER: I can't take	11	Q. How much money are you alleging was
12	both of you at the same time. Please	12	stolen from the Middle East Forum?
13	one at a time.	13	A. From who?
14	BY MR. CARSON:	14	Q. Are you alleging that money was stolen
15	Q. Stop. I'm asking you a question. How	15	by the -- from the Middle East Forum?
16	much money?	16	A. I'm alleging --
17	A. Mr. Carson, if you'll just --	17	Q. Yes or no? Are you alleging -- in the
18	Q. How much money are we talking about?	18	case -- in a counterclaim against Lisa Barbounis that
19	A. If you would let me finish my answer,	19	-- it's based on money that was stolen from the
20	please.	20	Middle East Forum, yes or no?
21	MR. GOLD: Lower the decibel here	21	A. Mr. Carson, I am alleging -- actually
22	-- I mean, you're like -- my -- there's	22	it's not me, it's the organization that's alleging,
23	no need to scream. We're really --	23	that Ms. Barbounis both facilitated, she covered up,
24	BY MR. CARSON:	24	she defrauded, and then breached her duty of loyalty
25	Q. How much money are we talking about?	25	to the organization, because as I say what she quotes
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1	A. Mr. Carson, it would be --	1	on Thursday, March 7th, 2018, she says "and now I
2	MR. GOLD: Hold on, Mr. Roman.	2	have proof about the money." She says you are a liar
3	Please slow it down. The stenographer	3	and a thief.
4	is not going to -- the record is going	4	Q. How much money are we talking about?
5	to be lousy.	5	A. She says you will never change because
6	THE COURT REPORTER: The record is	6	you are a horrible human.
7	going to be a mess. The record is going	7	Q. How much money are we talking about?
8	to be a mess.	8	A. Tens of thousands of pounds --
9	BY MR. CARSON:	9	Q. How much exactly --
10	Q. How much money are we talking about?	10	A. -- that would be --
11	How much money --	11	Q. -- was taken?
12	A. Can I answer --	12	A. Exactly -- like I said beforehand in
13	MR. CARSON: Please type my -- I	13	the original answer, 25,000 pounds --
14	want every time I ask this question to	14	Q. Okay. Thank you.
15	be on the record.	15	A. -- plus interest --
16	BY MR. CARSON:	16	Q. I'm going to ask another question now.
17	Q. How much money are we talking about?	17	Thank you.
18	A. So, like I said before --	18	A. I can't -- I want to finish --
19	MR. GOLD: Well, you've	19	Q. 25,000 pounds.
20	interrupted him four times already, so	20	A. -- the answer, Mr. Carson.
21	go ahead.	21	Q. Can you give me a breakdown of why --
22	BY MR. CARSON:	22	MR. GOLD: What's the next
23	Q. How much money are we talking about?	23	question?
24	A. It would be 25,000 pounds plus interest	24	BY MR. CARSON:
25	plus whatever punitive damages that we would have as	25	Q. Why is it 25,000 pounds? Give me --

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1	how much?	1	Bishop --
2	A. As I said beforehand, the approximate	2	Q. Daniel Thomas is a witness in this
3	amount would be the amount of money that we granted	3	case?
4	to the individuals who organized the Tommy Robinson	4	A. He may be. I think we may have put him
5	rally in June of 2018 plus interest --	5	on the list of the initial Rule 26 disclosures. If
6	Q. All that money was stolen.	6	he's not there, he should be amended.
7	A. Yes, as a result of breach of contract,	7	Q. You're going to fly him to the United
8	we have a duty that's in that contract, you can	8	States?
9	review the contract -- it's an exhibit that's part of	9	THE COURT REPORTER: What was
10	the counterclaim, that allows us to collect not just	10	that?
11	the money that was granted but also any damages that	11	THE WITNESS: I will do --
12	came as a result of our organization being defrauded	12	THE COURT REPORTER: What was
13	by Lisa Barbounis and Daniel Thomas.	13	that?
14	Q. How much money exactly did they -- do	14	THE WITNESS: -- whatever is
15	you allege was used that didn't go toward putting on	15	necessary to make sure -- you know, so
16	the rally?	16	-- we got coronavirus we got to worry
17	A. Well, Mr. Carson, I believe that there	17	about, we have to worry about maybe the
18	is an accounting of that that came --	18	guy's going to be --
19	Q. So how much is it?	19	BY MR. CARSON:
20	A. I would say at least, if you look at	20	Q. I asked if you were going to fly him to
21	the contractual language, all of the money was	21	the United States. It's a yes or no question. I
22	misappropriated, and as soon as one pound is	22	don't need to hear about coronavirus.
23	misappropriated, all the money is misappropriated	23	A. I don't know. You know, there may be
24	according to the terms of the contract. It's very	24	the ability for us to conduct --
25	clear. It's very clear.	25	MR. GOLD: We'll check with his
	Page 333		Page 335
1	Q. And you're alleging that Ms. Barbounis	1	travel agent.
2	was involved in Daniel Thomas not spending all the	2	THE WITNESS: Yeah. Well, not
3	money on the -- allegedly not spending all the money	3	just that --
4	on the rally?	4	MR. CARSON: Thank you.
5	A. As soon as she became aware of the	5	THE WITNESS: -- some judges now
6	fraud she had a duty to the organization to report	6	are allowing for --
7	it. As soon as she stopped and thought about it and	7	MR. CARSON: I heard your
8	said it in multiple messages to other people, she	8	attorney's answer. Thank you.
9	became part of the conspiracy. When she became part	9	THE WITNESS: Okay.
10	of the conspiracy of fraudulent -- aiding and	10	BY MR. CARSON:
11	abetting the fraudulent misrepresentation of funds	11	Q. So Daniel Thomas told you that he stole
12	which were granted to Danny Thomas, she breached her	12	money?
13	duty of loyalty to the organization, and that's why	13	A. Yes.
14	those three claims have been filed against Ms.	14	Q. Did you ask for it back?
15	Barbounis.	15	A. Yes.
16	Q. Can you prove any money was stolen?	16	Q. From Daniel Thomas.
17	A. Yes.	17	A. I did.
18	Q. How?	18	Q. In writing?
19	A. Based on the testimony of at least four	19	A. I think I did verbally and I also said
20	people involved and the text messages of	20	that we are considering pursuing litigation against
21	Ms. Barbounis and of Ms. McNulty and of Ms. Marnie	21	Mr. Thomas both in the United States and in the
22	Meyer. I have seven witnesses who will show that	22	United Kingdom. We --
23	that money was stolen.	23	Q. Have you done anything? Have you
24	Q. Well, name one of them.	24	started any litigation against Daniel Thomas?
25	A. I just did. Daniel Thomas, Kalina [ph]	25	A. Yes, there is two pending lawsuits that

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1	we're about to file. The first is being filed by	1	ability to take a barrister or a solicitor to start
2	Sidkoff, Pincus & Green. The attorney is Robert	2	pre-discovery before the filing of a lawsuit. The
3	Davitch.	3	Middle East Forum has attained a lawyer in the United
4	Q. I asked you a yes or no question. Have	4	Kingdom -- first we attained the firm Mishcon de
5	you started any litigation against Daniel Thomas as	5	Reya, which was in March of 2020, and they were to
6	of today. It's 11/20/2020. Can I go into a docket	6	interview Jazmin Bishop before Ms. Bishop was
7	somewhere and see a case that you filed against him,	7	intimidated into no longer testifying and then --
8	yes or no?	8	THE WITNESS: Mr. Gold, do you
9	A. No, well -- Mr. Carson, as you know --	9	know the name of the firm -- or
10	Q. So you haven't --	10	Mr. Rieser, do you know the --
11	A. -- the process --	11	BY MR. CARSON:
12	Q. -- started litigation against Daniel	12	Q. You can't ask your lawyers questions in
13	Thomas today.	13	the middle of a deposition.
14	A. -- the process of starting	14	A. Okay. Sorry. So there is a firm whose
15	litigation --	15	name I don't specifically remember right now but I
16	Q. So stop lying, Mr. Roman.	16	know that there has been this whole mess over a
17	MR. GOLD: Hold on.	17	passport photo, but there is a firm in the UK that's
18	BY MR. CARSON:	18	already been on Daniel Thomas for at least two months
19	Q. Stop saying yes when the answer is no.	19	and they are working in conjunction with Sidkoff
20	MR. GOLD: Mr. Carson, the word	20	Pinus & Green to file a RICO case against your
21	started means retaining a lawyer --	21	client, Ms. Lisa Barbounis, and I expect that
22	MR. CARSON: No, it doesn't. Mr.	22	complaint to either be given to you as a way in which
23	Gold -- no, it doesn't.	23	to start settlement negotiations or to be filed in
24	MR. GOLD: (Indiscernible.)	24	the Eastern District in the coming weeks.
25	MR. CARSON: Have you initiated	25	Q. Never have to give that to me to begin
	Page 337		Page 339
1	any litigation I said.	1	settlement negotiations.
2	THE COURT REPORTER: Excuse me.	2	A. Well, I'm just saying, I don't know how
3	Excuse me. I can't hear Mr. Gold. I	3	it works, but a letter was sent to you on September
4	couldn't hear any of that conversation.	4	28th --
5	Everybody is talking all over each	5	Q. Okay. All right. There is no --
6	other.	6	A. -- and --
7	BY MR. CARSON:	7	Q. Mr. Roman, there is no question pending
8	Q. Have you initiated any litigation. The	8	right now. We're not having a conversation with each
9	answer is no, correct?	9	other.
10	A. No, that's incorrect. I have initiated	10	MR. GOLD: Next question.
11	litigation.	11	THE WITNESS: I'm just answering
12	Q. So there is a courthouse -- what court	12	your last question.
13	have you filed a case in?	13	MR. GOLD: Next question.
14	A. So in the United Kingdom --	14	BY MR. CARSON:
15	Q. What court have you filed a case in?	15	Q. Is there any other basis for the
16	Just give me the name of the court.	16	counterclaim other than what you've already testified
17	A. Mr. Carson, I'm still answering the	17	to?
18	last question.	18	A. Yes, there is at least 12 charges we're
19	Q. No, you're not. What court have you	19	considering.
20	filed a case in?	20	Q. I'm -- Mr. Roman, I'm not asking you
21	A. Mr. Carson, if you're familiar with the	21	about things that aren't in the counterclaim that are
22	way in which common law works in the United	22	bouncing around in your brain.
23	Kingdom --	23	A. Not 12 legal charges.
24	Q. Can you give me the name of the court?	24	Q. I'm asking you about what is in the
25	A. -- there is the ability -- there is the	25	counterclaim that you filed. Do you understand the

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1	difference?	1	the basis of the counterclaim?
2	MR. GOLD: Mr. Carson, you're	2	MR. CAVALIER: Same objection.
3	getting abusive now. If it's getting	3	BY MR. CARSON:
4	late for you, take a break and, you	4	Q. The factual basis is what I'm talking
5	know, get a cup of coffee, but --	5	about.
6	MR. CARSON: No, Mr. Gold, why	6	A. Sure. So we can start --
7	don't you take a break and have a	7	MR. CAVALIER: Same objection.
8	conversation with your client.	8	THE WITNESS: -- in June of
9	MR. GOLD: You know what, why	9	2018 --
10	don't we just take a five-minute break.	10	BY MR. CARSON:
11	We have a -- we're trying to get to the	11	Q. Do you understand what the basis means?
12	end of this thing. I just don't want	12	A. Yeah, yeah, I'm giving you the evidence
13	the record to be so replete with people	13	which --
14	jumping in and out. I respect the	14	Q. Let me help you. Let me help.
15	stenographer. And I want the record to	15	MR. GOLD: Mr. Carson -- you're
16	be clean. So let's take a five-minute	16	getting abusive again, Mr. Carson.
17	break, everybody take a deep breath, and	17	BY MR. CARSON:
18	come back and --	18	Q. I'm going to help. The basis of the
19	MR. CARSON: I want him to answer	19	counterclaim begin -- so you're alleging that Lisa
20	the question that's pending. He has to	20	Barbounis and Daniel Thomas --
21	answer the question --	21	MR. GOLD: (Indiscernible.)
22	MR. GOLD: What's the question?	22	MR. CARSON: Why are you
23	BY MR. CARSON:	23	interrupting me?
24	Q. The question that's pending, is there	24	THE COURT REPORTER: I can't hear
25	anything else that is in litigation now that the	25	you, Mr. Gold.
1	counterclaims are based on other than what you've	1	MR. GOLD: Mr. Carson, there is a
2	already testified to?	2	counterclaim filed right now against
3	MR. CAVALIER: Object to form.	3	your client.
4	You can answer.	4	MR. CARSON: Yeah, there is.
5	THE WITNESS: Okay. So there's	5	MR. GOLD: You know what the basis
6	Exhibit A to Exhibit HH which is replete	6	of it is. Just read it.
7	with dozens of accusations that -- or	7	MR. CARSON: No. I'm asking your
8	dozens of pieces of evidence that back	8	client about it.
9	the three charges --	9	MR. GOLD: Okay. He'll tell you
10	BY MR. CARSON:	10	what the basis of it is if that's what
11	Q. I want to know what -- I want to know	11	you want --
12	what the basis of the counterclaim is other than what	12	MR. CARSON: All right.
13	you've already testified to.	13	BY MR. CARSON:
14	A. We'll have to go through each exhibit	14	Q. So the --
15	and I can give you the relevance to each part if you	15	MR. CARSON: Stop interrupting,
16	would like to do that.	16	please.
17	Q. We're not going to take a break and let	17	BY MR. CARSON:
18	your lawyers tell you and then come back and tell me.	18	Q. The basis that you've already testified
19	A. You don't have to. I don't have to	19	to is money that was stolen with regard to this
20	take a break, Mr. Carson. I can go exhibit by	20	25,000 dollar -- pound grant. So what -- besides
21	exhibit right now without taking a break. Let's do	21	that grant, what else is the basis of your
22	it.	22	counterclaim?
23	Q. No. I want to know from you what the	23	MR. CAVALIER: Object to form.
24	basis of the counterclaim is. I'm not going to show	24	You can answer.
25	you the complaint so you can read it to me. What is	25	THE WITNESS: So we start in June

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1	of 2018. Ms. Barbounis gives the	1	A. Well, you're asking me about the
2	representation that Daniel Thomas is a	2	diagram.
3	reliable agent from which we can use to	3	Q. No, I didn't. I said explain it.
4	facilitate a rally in the United	4	What's the first thing you would show me?
5	Kingdom.	5	A. Well, to explain it I have to look at
6	BY MR. CARSON:	6	it.
7	Q. That's the one I just said.	7	Q. No. Mr. Roman, I'm asking you a
8	A. Huh?	8	question. You're refusing to answer it.
9	Q. This is the one I just said, the 25,000	9	A. I'm not refusing. I'm trying --
10	pound.	10	Q. Then tell me what the basis is.
11	A. I'm getting there. You asked me what	11	MR. GOLD: Mr. Carson --
12	the basis --	12	BY MR. CARSON:
13	Q. I'm asking what the other ones are.	13	Q. What is the basis of the counterclaim?
14	A. Well, Mr. Carson, it starts --	14	THE COURT REPORTER: Excuse me.
15	MR. GOLD: Mr. Carson, let him	15	Every time -- I can see Mr. Gold is
16	finish the answer.	16	trying to say something. I can't hear
17	MR. RIESER: Seth, I think the	17	anything when you're saying something.
18	court reporter really needs a break.	18	It's just not coming through.
19	MR. CARSON: I said other than	19	BY MR. CARSON:
20	what we've already testified to.	20	Q. What's the basis for the counterclaim?
21	THE COURT REPORTER: I can't hear	21	MR. GOLD: Mr. Carson, please stop
22	anybody. I can't hear anybody.	22	--
23	MR. RIESER: Seth, the court	23	BY MR. CARSON:
24	reporter really needs a break.	24	Q. Stop going on your computer and pulling
25	MR. CARSON: Well, he's going to	25	up a diagram.
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1	answer this question first.	1	MR. GOLD: Mr. Carson, stop
2	MR. CAVALIER: You realize the	2	interfering with the witness's --
3	question is so incredibly broad that you	3	MR. CARSON: He can't go on his
4	got to give him leeway to answer.	4	computer and read an answer from his
5	MR. CARSON: No, I don't. I said	5	computer screen, which is exactly what
6	other than -- other than the 25,000,	6	he's doing right now.
7	other than him -- other than the	7	MR. GOLD: You already made that
8	relationship with Daniel Thomas, what	8	clear. He's not going into the
9	else. Is there anything else.	9	computer, he's not --
10	THE WITNESS: Yes.	10	MR. CARSON: That's exactly what
11	BY MR. CARSON:	11	he's doing right now.
12	Q. What?	12	THE WITNESS: That's not what I'm
13	A. Would it be -- would it help you if I	13	doing, Mr. Carson.
14	showed you a diagram.	14	BY MR. CARSON:
15	Q. No, it would help me if you just were	15	Q. All right. So then tell me what --
16	specific and testify to that.	16	why is this so difficult? Just tell me the basis of
17	A. The diagram has all the specificity	17	the counterclaim.
18	that might provide --	18	THE COURT REPORTER: I can't hear
19	Q. Just tell me.	19	you.
20	A. -- the answers that you're looking for.	20	BY MR. CARSON:
21	Q. Can you -- explain the diagram. What's	21	Q. Why is this so difficult? What's the
22	the first thing you would show me?	22	basis for the counterclaim?
23	A. Okay. So give me a second. I'll get	23	MR. CAVALIER: Object to form.
24	the diagram.	24	BY MR. CARSON:
25	Q. No.	25	Q. What we're talking about is other --

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<p>1 other than what we've already testified to.      2 A. This is like Abbott and Costello Who's      3 On First.      4 MR. CAVALIER: It's also not his      5 counterclaim.      6 THE WITNESS: Yeah, so -- no, but      7 I can answer, Mr. --      8 BY MR. CARSON:      9 Q. You're the quarterback of it.      10 THE WITNESS: -- Cavalier.      11 Mr. Carson, I am not the      12 quarterback of anything.      13 BY MR. CARSON:      14 Q. Just answer the question.      15 A. Okay. So starting in June of 2018 you      16 know about -- you know about --      17 Q. Now you're going to -- you're going to      18 talk about the \$25,000?      19 A. No, you know about the grant already.      20 Q. Right. Thank you.      21 A. Okay? And how Ms. Barbounis defrauded      22 the organization by covering it up.      23 Q. Right, I understand --      24 A. Breach of contract, all of that. Then      25 there was another action that Ms. Barbounis started</p>	<p>1 Q. How did the money get funneled from      2 Raheem Kassam --      3 A. So if you --      4 Q. -- back to --      5 A. -- look at the -- if you look at the      6 text messages and the PayPal transfers between      7 Raheem, Lisa, Tricia, and Vasili -- and we would have      8 to go to the -- I have it ready if you want to see      9 it.      10 Q. No, no. I want you to testify about      11 it.      12 A. Okay. Well, I'm testifying about what      13 I've seen. So there's the --      14 Q. That's right.      15 A. -- there's the text messages between      16 Raheem, Lisa, and Tricia, and then Lisa says, hey,      17 Raheem, I'm going to get you that money, and at the      18 same time she's telling me that Raheem is not willing      19 to help host the event if he's not paid. So she's      20 saying to me representing Raheem needs the money to      21 be able to do the event. She's saying to Raheem,      22 hey, take that money, make sure that my husband gets      23 paid, it's going to help me pay to go over there.      24 And the whole reason why -- and this is even based on      25 Tricia's conversations with Lisa, Raheem Kassam was</p>
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<p>1 right at the outset, too, and that was when she      2 misappropriated \$5,000 which was granted to Raheem      3 Kassam, then a fellow of the Middle East Forum, and      4 directed the money to be paid from MEF to Kassam to      5 her husband to cover her flights to the United      6 Kingdom when the written agreement that she had with      7 MEF that it would only be \$300.      8 Q. What flights to the United Kingdom?      9 A. The flights that she took to fly to      10 London.      11 Q. When? When did she fly to London with      12 this money?      13 A. For the rally we're talking about, June      14 of 2018, the one that you asked me about beforehand.      15 Q. So \$5,000 you're saying that was given      16 to Raheem?      17 A. And then the money was funneled back to      18 Vasili Barbounis.      19 Q. Who funneled the money to Vasili      20 Barbounis?      21 A. Lisa Barbounis and Raheem Kassam. And      22 also Tricia McNulty took part in it, too.      23 Q. How?      24 A. I think we're considering adding her as      25 a third party complaint.</p>	<p>1 trying to sleep with Tricia McNulty. It started at      2 AIPAC in March of 2018 and then they were flirting      3 over text messages. We'll probably see more when you      4 produce Tricia McNulty's text messages in the McNulty      5 case, that's still outstanding discovery obligations      6 that you and your client in that case have. But at      7 the outset, from what we can tell from the Barbounis      8 text messages, is is that thousands of dollars were      9 misappropriated in a scheme started by Lisa Barbounis      10 before she even knew about Danny Thomas taking the      11 money. So that's where it starts. Then the next      12 basis for her fraudulent -- I'm speaking too fast. I      13 apologize. I'll try to go a little bit slower.      14 Q. Just keep going.      15 A. I saw the look of despair on the      16 stenographer's face. I'm really sorry. So -- I'll      17 slow down.      18 Okay. So then Ms. Barbounis became      19 aware of a trip involving Congressmen Paul Gosar,      20 representative from Arizona, and the travel of      21 Mr. Cliff Smith, the director of the Washington      22 Project of the Middle East Forum, and she writes to      23 her husband back in June of 2018, wow, I would quit      24 right now if I knew that Cliff was going instead of      25 me. That doesn't necessarily go to the actions that</p>

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1	she took, but it goes to motive. That's what we'll 2 include in our arguments as it's associated with 3 that. She goes in July of 2018 to the UK which I 4 think is for another rally or maybe the release from 5 jail for Tommy Robinson. And then she starts getting 6 involved with Danny Tommo in a more -- this was 7 before they started their sexual relationship, but 8 she gets more involved with Danny Tommo and Tommy 9 Robinson saying to her mother, oh, I would like to go 10 work for Tommy Robinson, I would like to be the PA to 11 Tommy Robinson, I would like to be able to meet him 12 after he gets out of jail. So then she travels to 13 the UK with her mother -- I think we already have 14 testimony about this --	1 to assist Mr. Robinson with his rally or release, but 2 it actually, even according to her testimony, was the 3 beginning of a love affair that took place between 4 her and Mr. Thomas. She then defrauded MEF by 5 alleging that I committed sexual harassment against 6 her in March of 2018 with the intent of what she 7 calls the Gregg plan to get me fired. That caused 8 unenumerated damages to the Middle East Forum with us 9 losing donations, that cost us leading productive 10 time, our relationships with congress -- our 11 organization was debilitated and handicapped because 12 of Ms. Barbounis's fraud. Now we get into December 13 of 2018 and that is when some of the worst examples 14 happen. She started to act as an agent for 15 Mr. Robinson to try to get him a Visa to the United 16 States, an act originally supported by Daniel Pipes, 17 but a specific message was given to Ms. Barbounis 18 saying the organization's policy was it's better for 19 Mr. Robinson to be in the UK where he can have his 20 activism rather than using company resources to try 21 to facilitate what I think Ms. Barbounis considered 22 asylum from the United Kingdom. Then in January and 23 February of 2019 Ms. Barbounis started identifying 24 herself as the director of communications for 25 TR.news. TR.news is a for-profit corporation in the	Page 354
1	Q. You're starting to go off -- you're 2 starting to go rogue again. We need -- we're just 3 talking about the basis of the counterclaim. A. Yeah, this is the basis of the complaint, Mr. Carson.	1	Page 355
2	Q. So you did a good job when you said the 3 5,000 with Raheem, you -- I'm just looking for the -- 4 what was -- what the damages are, that's all. A. Yeah. So the damages I would argue -- Q. I don't need to hear about her mother and the relationship.	1	United Kingdom which was originally organized in 2 participation with a website called Politici [ph] 3 which was meant for Ms. Barbounis during that time -- 4 there is recordings that you provided to us, I can 5 play those recordings if you want to hear them, where 6 she was trying to arrange a second job in the United 7 Kingdom while at the same time representing through 8 MEF systems that she was our director of 9 communications. So it was basically like a virus 10 that took over the systems of an organization. She 11 step by step started co-opting the levers of power in 12 the organization to use MEF money, MEF time. She 13 misappropriated --
3	A. Well, no, but the mother and the relationship have everything to do with it. Q. But just -- I don't need the whole backstory, Mr. Roman. I know it. I've been working on this for two years. I just want to know the damages, what the basis is. A. So the damages I guess if we want to add something else -- and, by the way, just for the record, I stopped in July of 2018. There is a whole story to tell until even today -- Q. I don't need to hear -- A. -- where the conspiracy continues. Q. -- the whole stories, but go, what's the basis. A. So the damages would also be the after-acquired evidence that we've had from the time that Lisa Barbounis started defrauding our organization, so I guess we would be seeking her to pay her entire salary to us that we paid to her while she was defrauding us from June of -- Q. Is there any other examples of her defrauding you than what you've said now -- A. Yes, many. So in October of 2018 she misrepresented the reason why she wanted to go to the United Kingdom. She said it was because she wanted	1	Q. How much MEF money has she used? A. I would say that the damages that she's directly and -- Q. How much MEF -- I don't want to know the total damages. I want to know how much money she used that was MEF's money for any of this stuff that you're saying she did. A. So -- it depends on -- Q. Like if a plane ticket was 500, the answer is 500. A. No. So it's not 500. If we're going to do a damage assessment and calculate the damages
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1	--	1	that Gary was back, also that Marnie had made another
2	Q. Just give me a ballpark number, man.	2	allegation against Gregg which Gregg was very upset
3	Come on.	3	about because he didn't know what the allegation was.
4	A. -- she's responsible for at least \$4	4	They were apparently concerned that Marnie may have
5	million in damages done to the Middle East Forum.	5	gone out to find an old intern of MEF by the name of
6	Q. How much?	6	Gabrielle Bloom.
7	A. \$4 million is the minimum amount of	7	So when another allegation came about
8	what she's responsible in her damages to the Middle	8	you, why did you think it was Gabrielle Bloom they
9	East Forum.	9	were talking about?
10	Q. You're not understanding my question.	10	A. Well, first of all, I don't think there
11	MR. CARSON: All right. We can	11	was another allegation against me. I think that
12	take that break now.	12	there was a misrepresentation of a phone call to
13	MR. GOLD: Thank you.	13	Daniel Pipes by Tricia McNulty where McNulty revealed
14	(A discussion was held off the record.)	14	to Matt Bennett that there was a rumor that Lisa
15	THE VIDEO SPECIALIST: We are off	15	Barbounis started about me, and thereby I said to
16	the record. It is 7:16 p.m. Eastern.	16	Mr. Bennett they're trying to get everyone against
17	(A brief recess was taken.)	17	me, and by everyone I meant people who may have ever
18	THE VIDEO SPECIALIST: It is 7:32	18	been employed by MEF, and I don't think this is the
19	p.m. Eastern and we are now on the	19	only name I said, I said Grayson Levy, I said Gary
20	record at 7:32 p.m. Eastern.	20	Gambill, who had just been rehired at that time by
21	BY MR. CARSON:	21	the Middle East Forum, I spoke about Bennett himself,
22	Q. Who is Gabrielle Bloom, Mr. Roman?	22	and the reason why I was speaking to Bennett was
23	A. Well, I know a few Gabrielle -- I	23	because he was helping me with a story that I was
24	actually know two. I believe the one you're speaking	24	writing, and I actually believe it was he who
25	about was an intern at the Middle East Forum.	25	initiated phone calls with me rather than I who
	Page 357		Page 359
1	Q. Did you guys pay her money?	1	initiated phone calls with him.
2	A. You guys, the Middle East Forum.	2	Q. The other claim against you was a claim
3	Q. Sure.	3	that Marnie Meyer made where she said that you were
4	A. At the direction of Lara Szott and the	4	spreading rumors about her and Caitriona Brady's
5	suggestion of Marnie Meyer she received a agreement	5	father. Do you recall that?
6	for four projects of extra work in the summer of 2016	6	A. No, I never spoke with Meyer or Brady
7	or '17. Of how much she accomplished, you have to	7	about that, but the e-mails that I've seen since this
8	ask Lara since she was her supervisor.	8	litigation began show that Lisa Barbounis started
9	Q. So do you recall a telephone call	9	that rumor, not Marnie Meyer.
10	between you and Matthew Bennett --	10	Q. What e-mail have you seen that shows
11	A. Matt Bennett and I have had countless	11	that Lisa Barbounis started that rumor?
12	phone calls. Which one are you referring to?	12	A. There was a communication between
13	Q. I wasn't done the question.	13	Daniel Pipes and Lisa Barbounis where Daniel asks I
14	So -- I'm going to put a document in	14	believe it was either Marnie or Lisa where did you
15	front of you.	15	hear this rumor, Marnie says Lisa, and then the
16	A. Okay.	16	question is was that before or after November 2018,
17	Q. So it's way up -- past it. All right.	17	and Lisa says before.
18	So I'm going to put a document in front of you and	18	Q. Weren't they talking about when you
19	it's going to look like this. So Tricia McNulty sent	19	spread the rumor?
20	an e-mail to Gregg Roman like this. She sent -- and	20	A. That's a question based on a factual
21	she talks about this phone call. I received a phone	21	predicate that didn't exist, Mr. Carson. I never
22	call from Matt Bennett last night. He started the	22	spread any rumor --
23	conversation with pleasantries but then began to	23	Q. But --
24	discuss current MEF internal operations. He is	24	A. -- or started --
25	apparently speaking to Gregg every two days, knew	25	Q. -- that's what they were referring to,

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1	right?	1	Daniel Pipes?
2	A. I don't know what they were referring 3 to. I think that they were actually referring to the 4 groundwork they were laying to prepare for litigation 5 against the Middle East Forum.	2	A. Whenever the top of the time stamp has 3 the e-mail addressed to it. I don't remember the 4 exact day, Mr. Carson --
6	Q. In April of 2019 that's what your 7 testimony is, that they were laying groundwork for 8 litigation?	5	Q. What did you say in the e-mail?
9	A. My testimony is that after this 10 litigation began I had the opportunity to review 11 thousands of messages between Meyer and McNulty and 12 Brady and Barbounis and Yonchek and also the messages 13 between Barbounis and dozens of other individuals in 14 the United Kingdom and also Belgium and Canada and 15 Texas --	6	A. I don't remember what I said, 7 Mr. Carson.
16	Q. Mr. Roman --	8	Q. Did Mr. Pipes ever talk to you about it 9 in person?
17	A. -- and Washington D.C. --	10	A. Not that I remember -- well, yes, he 11 did, Mr. Carson.
18	Q. -- I asked you --	12	Q. Did he talk to you about it in person 13 back in the middle of 2019?
19	A. I'm answering your question.	14	A. No, Mr. Carson. The only time I was 15 with Daniel Pipes in the middle of 2019 was twice, once to record videos that were for MEF's 2019 --
20	Q. It has nothing to do with text messages 21 in the United Kingdom.	17	Q. When I say talk to you in person -- when I say talk in person, that includes phone calls.
22	A. It has everything to do with it, Mr. 23 Carson.	19	A. No, I don't remember speaking to him 20 over the phone about --
24	Q. I asked you if they were referring to 25 something that happened before November of 2018,	21	THE COURT REPORTER: Sorry. 22 Repeat that, Mr. Carson.
	Page 361		23 BY MR. CARSON:
1	isn't that what they were talking about.	24	Q. When I say talk in person, I don't mean 25 face to face, I mean have a conversation that's not
2	A. No, and I answered that, I said that 3 question was based on a factual predicate that 4 doesn't exist, thereby there was no rumor.	1	electronic, phone calls included. Okay? That's what 2 I mean.
5	Q. The allegation was is that you said 6 that the only reason Marnie Meyer got her job was 7 because she was trading sex with Caitriona Brady's 8 father, right?	3	A. Right. No, what I remember is is that 4 whenever there was an allegation that was of a legal 5 nature or anything dealing with anything that was 6 innuendo or sexual or anything of a personal nature 7 it was always either done with counsel or it was done 8 electronically so there was a record that would be 9 established in the case of eventual litigation like 10 this.
9	A. No, you then asked me what was the 10 groundwork for that allegation --	11	Q. Well, so have you ever sat down and 12 talked to Mr. Pipes by phone, in person, any way, by 13 Facebook, voice messenger, by -- you know, any time 14 where you and Mr. Pipes had a conversation with each 15 other, did you guys ever sit down and have a 16 conversation about these allegations that Marnie 17 Meyer made in April 2019?
11	Q. Wasn't that the allegation?	18	A. No.
12	A. No, I don't know what the allegation 13 was because I never heard the allegation, Mr. Carson, 14 nor do I know what rumor you're talking about.	19	Q. Did you ever have a conversation of 20 that nature about any of the allegations that Lisa or 21 Marnie or Patricia made?
15	Q. Mr. Pipes never talked to you about it?	22	A. With counsel?
16	A. If you'll let me finish my answer, I 17 said I never heard the allegation or the rumor from 18 any of those involved. I received an e-mail --	23	Q. No, with Dr. Pipes.
19	Q. Did you hear it from Mr. Pipes?	24	A. Just with him alone.
20	A. I received an e-mail from Daniel Pipes 21 which laid out what these other people had 22 misrepresented and had lied about, and then I had to 23 answer that e-mail, and I think you probably have a 24 copy of the answer that I gave.	25	Q. Where you and Dr. Pipes had a
25	Q. Well, when did you get the e-mail from		

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<p>1 conversation about -- where you talked about it, 2 where you guys had a discussion. 3 A. No, we've only communicated about this 4 in the presence of counsel and not with each other 5 but just with our attorneys. 6 Q. I don't understand what you mean by 7 that, so -- 8 A. So I'm in a room, okay, and there is an 9 attorney there, and the attorney is saying, 10 Mr. Roman, A, B, C, privilege, privilege, privilege, 11 and I respond, Mr. Attorney, X, Y, Z. Never did I 12 have a direct conversation with Daniel Pipes about 13 any of the allegations that was not in the presence 14 of counsel. 15 Q. Well, how many -- 16 A. Meaning, we have a -- we have a policy 17 in place that whenever there is anything of a legal 18 nature we make sure that we follow the proper 19 channels, policies, and procedures, to do three 20 things. Number one, to make sure -- 21 Q. I don't need to know -- I don't need to 22 know your -- the policies. I just am -- 23 A. Okay. 24 Q. -- questioning about the conversation. 25 So how many --</p>	<p>1 Q. That's what I'm asking you about. Have 2 you ever had a conversation -- 3 A. And I'm -- I'm trying to finish this, 4 Mr. Carson. For at least the first year from 5 November of 2018 until October or November of 2019 6 there was no one-on-one discussions besides ones in 7 which he would say -- and it depends on the 8 allegation that we're talking about, but the general 9 gist of it was there are a plethora of things that 10 have been said about you, we have to mitigate risk to 11 the organization, and that's why you're no longer in 12 administration, and we only started talking about 13 litigation strategy, really talking about litigation 14 strategy, after your clients filed their lawsuits in 15 late October of 2019. 16 Q. So before that how many times did you 17 and Mr. Pipes have an in-person conversation, that 18 includes telephone calls, how many times before that 19 did you guys have in-person conversation about the 20 allegations made by Lisa, by Patricia, or by Marnie? 21 A. Well, there was the one time that he 22 told me that I was removed and he had suggested that 23 this was because -- just on a dialogue that we had 24 gone on beforehand a few hours ago, Mr. Roman, 25 accusations have been made against you, in response I</p>
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<p>1 A. Which conversation? 2 Q. -- of these conversations did you have 3 where counsel was there, how many of these types of 4 conversations did you have? 5 A. About which, about sexual -- 6 Q. About any of the allegations in this 7 case or with Patricia McNulty. 8 A. There have been countless conversations 9 with counsel since November 1st, 2018, in multiple 10 stages, but they really started picking up after you 11 filed your EEOC complaint. Sorry, not -- they're not 12 yours. After -- 13 Q. I'm not -- so I'm talking about in 14 connection with your employment, so I'm not talking 15 about litigation strategy sessions, I'm talking about 16 did Mr. Pipes ever have a conversation with you, 17 whether counsel was there or not, about any of these 18 allegations in person where it was a discussion about 19 just the allegations and how you were going to handle 20 it and, like, you know, where he was telling you, 21 like, these allegations are serious, did that ever 22 happen? 23 A. When I have spoken with him about these 24 allegations it has always been in the presence of 25 counsel and for at least the first --</p>	<p>1 am taking you out of administration of the 2 organization. 3 Q. Okay. 4 A. And then the next conversation which 5 was of a direct relation to this nature counsel was 6 present but just the two of us. Mr. Roman, they have 7 been EEOC complaints filed against the organization, 8 you're going to have to work with counsel to be able 9 to address this, and that was both in-house and 10 outside counsel, and then the last time that we -- 11 before litigation was filed was when you were sending 12 demand letters for millions of dollars to the Middle 13 East Forum and we were determining the strategy of -- 14 well, that's a strategy question, so I really -- 15 can't really comment on that, but we discussed in 16 general how we thought that this was un -- I don't 17 want to say that -- or strike that. We were 18 discussing in general how -- I'm trying to find the 19 best words to represent the sense of sorrow that I 20 felt about your clients related to that they had been 21 wrapped into this web of lies that you were then 22 allowing them to try to litigate against us. And 23 after that, October 26th, 27th, there were many 24 discussions, not one-on-one, but with counsel, of 25 what I remember, what Dr. Pipes remembers, of what</p>

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<p>1 staff did, interviews, and that's when we really      2 started getting into it of unraveling everything.      3 Q. In March, April, and May did Mr. Pipes      4 ever talk to you about retaliation in person?      5 A. March, April, and May of when?      6 Q. 2019.      7 A. What do you mean retaliation?      8 Q. Did he ever talk to you about      9 retaliation?      10 A. You have to be more specific.      11 Q. No, I'm being specific.      12 MR. CAVALIER: Object to form.      13 BY MR. CARSON:      14 Q. Retaliation. Did he ever come -- did      15 he ever call you on the phone, did he ever have a      16 conversation with you, did you guys ever have a      17 conversation about retaliation?      18 MR. CAVALIER: Object to form.      19 THE WITNESS: I really don't know      20 what you're talking about, Mr. Carson.      21 BY MR. CARSON:      22 Q. Do you know what retaliation is?      23 A. Well, you can retaliate against a      24 quarterback, you can retaliate against a hit to your      25 team --</p>	<p>1 Q. I'm talking about the legal definition.      2 If you don't know --      3 A. No, no, but I'm just trying to say this      4 is -- you're asking me my perspective, right?      5 Q. No, I'm asking if you know what the      6 legal definition of retaliation is.      7 A. So I'm --      8 Q. If you don't, I will tell you. Just      9 say, no, I don't know, and I'll tell you.      10 A. Mr. Carson, you have filed multiple      11 retaliation --      12 Q. I'm not asking you about what I filed.      13 I'm asking you if you understand what retaliation is.      14 A. Mr. Carson, I believe -- I believe my      15 understanding of retaliation is different from your      16 understanding of retaliation.      17 Q. Okay. It sounds like you don't know,      18 so let me explain. Retaliation specifically refers      19 to acts that are taken adverse to an employer's --      20 employee's interest because they reported      21 discrimination or harassment in the workplace.      22 That's the legal definition.      23 MR. GOLD: That's not quite      24 accurate, but -- it's adverse actions      25 are taken against one who voices</p>
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<p>1 Q. Do you know what retaliation is with      2 respect to the types of claims that we're dealing      3 with?      4 MR. CAVALIER: Object to form.      5 THE WITNESS: Well, one of the      6 things that you categorize as      7 retaliation in your EEOC complaint from      8 December of 2019 --      9 BY MR. CARSON:      10 Q. Just --      11 A. I'm talking about that. I'm talking      12 about that.      13 Q. I'm asking you -- just say yes or no.      14 If you don't know, I'll help you understand it. Do      15 you know what retaliation is with respect to the EEOC      16 and with respect to Title 7 and the Pennsylvania --      17 A. Well, Mr. Carson --      18 MR. GOLD: Objection. Calls for a      19 legal conclusion. Why don't you explain      20 it to him first and then ask the      21 question.      22 BY MR. CARSON:      23 Q. Do you know what that is?      24 A. Well, there's what you in your      25 profession as a lawyer consider to be retaliation --</p>	<p>1 opposition to discrimination or sexual      2 harassment --      3 MR. CARSON: Mr. Gold --      4 MR. GOLD: -- not just adverse --      5 adverse actions. Go ahead.      6 MR. CARSON: Mr. Gold's been doing      7 this a lot longer --      8 BY MR. CARSON:      9 Q. So with that understanding I'm asking      10 did Mr. Pipes ever talk to you about retaliation,      11 whether -- like, did he ever say to you, Mr. Roman,      12 you have to be careful not to do anything that could      13 be conceived as retaliation?      14 MR. CAVALIER: Object to form and      15 also I'll ask the witness to be aware of      16 the fact that if such communications      17 occurred they may have occurred in the      18 presence of counsel --      19 MR. CARSON: That doesn't matter      20 if Dr. Pipes said it. It doesn't --      21 there is no privilege if -- no matter      22 where it's said.      23 THE WITNESS: What -- I'm lost      24 here. Who asked me what?      25 MR. GOLD: I also -- if there's a</p>

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1	conversation that occurs with Mr. Pipes	1	Q. Well, you understand that it wouldn't
2	present and Mr. Fink is offering counsel	2	matter whether you called them that if they -- if the
3	to both --	3	allegation's made it would be reasonable to have a
4	MR. CARSON: I'm not talking about	4	discussion with you about it, correct?
5	Marc Fink. I'm asking the question	5	MR. CAVALIER: Object --
6	about Mr. Pipes.	6	THE WITNESS: All allegations
7	BY MR. CARSON:	7	which were made against anyone at the
8	Q. Did Mr. Pipes ever talk to you about	8	Middle East Forum was done through
9	retaliation -- I don't know why this is such a hard	9	counsel. Mr. Pipes never directly said
10	question to answer. It's not a hard question. Did	10	to me without the presence of counsel
11	-- and it's -- I'm -- the question specifically	11	this, this, and this was said, this,
12	refers to March, April, May 2019. During those	12	this, and this is how you respond. He
13	months did Mr. Pipes ever talk to you about	13	has sent me e-mails which may have had
14	retaliation?	14	complaints of a nonsexual variety that
15	A. In what context? It's pretty broad.	15	did not relate to any other items that
16	Q. In the context of the reports of	16	you are addressing right now which may
17	discrimination or harassment that were made by Marnie	17	have said why are you asking about the
18	Meyer, Patricia Barbounis, and -- I'm sorry, Lisa	18	audit, why are you asking about
19	Barbounis and Patricia McNulty.	19	fundraising, but those are all
20	A. Not that I can remember, no.	20	operational questions that the head of
21	Q. So did he ever talk to you about it in	21	an organization can ask people who work
22	a specific context due to any e-mails that he	22	for him. So, no, he never did that in
23	received from Ms. McNulty or Ms. Barbounis?	23	the context of a sexual harassment or a
24	A. No, not that I remember.	24	retaliation as you had defined it or Mr.
25	Q. Did he ever tell you that he received	25	Gold defined it earlier nature.
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1	e-mails from Ms. McNulty or Ms. Barbounis where they	1	BY MR. CARSON:
2	alleged that they were being retaliated against?	2	Q. Did you call Raquel Swazetti [ph], who
3	A. No -- I don't remember if he ever said	3	I think is better known as Eman Patel, did you call
4	anything to me. He may have forwarded me e-mails	4	her a walking lawsuit?
5	from McNulty and from Meyer asking me to answer them.	5	A. No, I did not.
6	Q. So did he ever tell you that they made	6	Q. Did you say that she's a walking
7	the allegation that you had called them usurpers?	7	lawsuit because she is a woman, she's gay, and she's
8	A. Oh, that's another thing. That's a	8	Muslim?
9	great story.	9	A. No, Mr. Carson, that question is based
10	THE COURT REPORTER: Called them	10	on a factual predicate that did not happen. I never
11	what?	11	called Ms. Saraswati or Eman Patel a walking lawsuit.
12	MR. CARSON: Usurpers.	12	In fact, I celebrated her diversity and I was so
13	THE WITNESS: U-s-u-r-p-e-r-s.	13	proud when I presided over a -- I can preside over
14	BY MR. CARSON:	14	weddings, I have a license to preside over common law
15	Q. So --	15	marriages from the Universal Life Church which grants
16	A. That's one -- Mr. Carson, that's one of	16	this ability. When I presided over the wedding of my
17	my taglines from the radio.	17	best friend Ryan who lives in Los Angeles now and his
18	Q. Okay. So the question is, though, did	18	husband Joe in Brooklyn of May of 2016 I think, and
19	Mr. Pipes ever talk to you about an allegation that	19	the first person I told when they asked me to
20	you had called these women usurpers?	20	officiate the wedding was Eman Patel. I'm so happy
21	A. No, I never called them usurpers.	21	that she got to move on from the Middle East Forum to
22	Q. But did he -- whether you called them	22	work in the capacity of -- I think diversity
23	that or not, did he ever talk to you about it?	23	coordinator for an LGBT resource center in
24	A. I don't think so, because I never	24	Philadelphia. She's really somebody I admire. So,
25	called them that.	25	no, I would never call her a walking lawsuit --

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1	Q. Well, you --	1	A. No one named --
2	A. -- and I would never criticize -- what	2	Q. She was asked to transition to a
3	did you say?	3	position as your assistant?
4	Q. You forced her out of the Forum, right?	4	A. No one named Rosie ever worked for the
5	A. I never forced her out of any	5	Middle East Forum.
6	organization. She left MEF, and when she left MEF I	6	Q. She said I'll be dead before I work for
7	remember communicating with her saying is this really	7	Gregg Roman?
8	what you want to do, and she said I want to take a	8	A. Mr. Carson, again, that is a question
9	break, I'm looking for something more in my lane,	9	based on a factual predicate that never happened, so
10	which was associated with diversity, and I think MEF	10	you're misrepresenting anything that you're talking
11	gave her severance bonus of salary several times of	11	about.
12	what she had had, and I actually have the note that	12	Q. Did you ever rub your --
13	she wrote to me when she left the organization	13	A. Beyond that --
14	thanking me for the work that we had done together,	14	Q. -- body against a female employee?
15	and I'm sure that we can get you that correspondence.	15	A. Beyond that --
16	Q. Do you know --	16	THE COURT REPORTER: I can't hear
17	A. There never any there ill will --	17	you, Mr. Carson.
18	Q. Do you know who Rosie is?	18	BY MR. CARSON:
19	A. Hold on. There was never any ill will	19	Q. Did you ever rub your body against a
20	between myself and Eman Patel. I honor her, I	20	female employee --
21	cherish her, and I think the world of her.	21	A. Mr. Carson, I'm not done the question
22	Q. Are you sure that she doesn't have ill	22	about --
23	will?	23	THE COURT REPORTER: I still can't
24	A. She may, but --	24	hear you.
25	THE COURT REPORTER: I didn't hear	25	BY MR. CARSON:
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1	the question. I didn't hear the	1	Q. I said did you ever rub your body
2	question.	2	against a female employee while you were working with
3	BY MR. CARSON:	3	them?
4	Q. I said are you sure she doesn't have	4	A. No, I did not.
5	ill will.	5	Q. Ever force a female employee to sit
6	A. She may, but the last time I spoke with	6	next to you behind your desk and watch the computer
7	her was in probably September or October of 2019 when	7	screen with you?
8	I was asking how she was doing.	8	A. No, I did not.
9	Q. Are you sure she doesn't feel like she	9	Q. Ever call female employees at
10	was constructively discharged?	10	inappropriate hours after -- you know, at the end of
11	A. I don't know what you mean by that, Mr.	11	the day, at nighttime?
12	Carson.	12	A. Your characterization of that question
13	Q. Her work -- her work life was made so	13	of what an inappropriate hour requires clarification.
14	miserable that she quit and any reasonable person in	14	Can you please be more specific?
15	her shoes would have quit under those same	15	Q. Well, they're on their own private time
16	conditions.	16	at the end of the day, when they're not working.
17	A. No, I don't think she felt that way,	17	A. Mr. Carson, we have two kinds of
18	and if she did I wish that she would talk to me about	18	employees at the Middle East Forum. We have
19	it because we could have an honest conversation why	19	administrative employees who work from 9 to 5 and
20	she felt that way.	20	they're sometimes asked to work in off-hours, and we
21	Q. Well, did you -- what about Rosie,	21	also have professional employees who are expected to
22	Rose, do you know her?	22	be on the clock at any given time. For instance, if
23	A. Who is Rosie?	23	I'm in Israel and it's 12 p.m., there's a seven-hour
24	Q. She was an employee of the Middle East	24	time difference with our employees in the United
25	Forum --	25	States, so it would be 5 a.m., so it would not be

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1	beyond the pale of comprehension that we would ask an	1	BY MR. CARSON:
2	employee who was a professional exempt employee, I'm	2	Q. Don't you find that a coincidence, like
3	sure you're familiar with that term, to work at hours	3	there's -- every -- you respond to every single
4	which may not have been regular according to a 9 to 5	4	allegation of sexual harassment the same way --
5	schedule. So if you're asking did I ever communicate	5	(Simultaneous speakers.)
6	with someone from MEF outside of the 9 to 5 work	6	THE COURT REPORTER: I can't hear.
7	time, yes, of course I did. If you're asking if I	7	I can't hear the question. Please
8	ever did it inappropriately, no, it was always	8	repeat it.
9	appropriate and relevant to the task at hand.	9	(Simultaneous speakers.)
10	Q. Lisa Barbounis was a 9 to 5, though,	10	THE COURT REPORTER: I didn't hear
11	wasn't she?	11	the question or anything after it.
12	A. No, she was not. She was a	12	BY MR. CARSON:
13	professional exempt employee.	13	Q. You respond to every single allegation
14	Q. She's a executive assistant.	14	of sexual harassment by the plethora of women who
15	A. No, she wasn't. She was an executive	15	have made them in the last five years the exact same
16	liaison -- she specifically requested to be an exempt	16	way. They're all liars, aren't they?
17	employee when she started working for MEF because she	17	A. No, Mr. Carson.
18	did not want to be equated with an assistant. She	18	MR. CAVALIER: Object to form.
19	asked for that title. It's in an e-mail actually	19	MR. GOLD: Argumentative. Assumes
20	that she sent to us when she was negotiating with us.	20	facts not in evidence. Predicate of the
21	She got higher pay, she got more money for health	21	question is absolutely false. I'm going
22	insurance. She was a very good negotiator.	22	to ask you to rephrase the question.
23	Q. You fired Tiffany Lee because she	23	MR. CAVALIER: I didn't hear a
24	reported sexual harassment?	24	question; it's a statement you made.
25	A. No, I did not. I fired Tiffany Lee --	25	BY MR. CARSON:
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1	actually I didn't do it. Marnie Meyer was the one	1	Q. Is there a woman who has accused you of
2	who fired Tiffany Lee, and that was done after	2	sexual harassment who is not a liar?
3	Tiffany Lee was the subject of I think an improvement	3	MR. CAVALIER: Object to form.
4	plan that was put together. She failed to attain the	4	THE WITNESS: Mr. Carson, you have
5	goals of the improvement plan, she failed to go to an	5	to be more specific.
6	event, and then she tried to defraud the organization	6	BY MR. CARSON:
7	by demanding millions of dollars from us after Derek	7	Q. Well, is there one woman that has
8	Smith Law Group misrepresented text messages that she	8	accused you of sexual harassment that you can name
9	put forward, deconstructed those text messages, and	9	who is not a liar?
10	then we never heard from her again.	10	A. No, Mr. --
11	Q. Isn't it interesting how every woman	11	MR. CAVALIER: Same objection.
12	who accuses you of sexual harassment defrauds the	12	THE WITNESS: -- Mr. Carson, I sat
13	Middle East Forum and owes you millions of dollars?	13	here this evening and I heard you say
14	(Simultaneous speakers.)	14	that one woman didn't accuse me of
15	THE COURT REPORTER: I need you to	15	sexual harassment and then you said that
16	repeat the question and anything that	16	-- I'm sorry, I said that she did accuse
17	was said after it, please.	17	me of sexual harassment, you then said
18	BY MR. CARSON:	18	that she did accuse me of sexual
19	Q. Why do you claim that every single	19	harassment. I said, Mr. Carson, look at
20	woman who has accused you of sexual harassment owes	20	your complaint. You went back to it and
21	the Forum millions of dollars?	21	then you saw that, hold on, I actually
22	MR. CAVALIER: Object to form.	22	did, it was a typo. So every time --
23	THE WITNESS: Mr. Carson -- sorry.	23	every time I've been accused of sexual
24	MR. CAVALIER: Object to form.	24	harassment it has been by a client of
25	THE WITNESS: Can I answer?	25	the Derek Smith --

## Deposition of GREGG ROMAN

Lisa Barbounis v. Middle Eastern Forum, et. al.

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1	BY MR. CARSON: Q. That's not true. A. -- Law Group. Q. Is it? A. No, Mr. Carson. Every time I have been accused of sexual harassment it has been done by a client of the Derek Smith Law Group.	1 A. Mr. Carson -- 2 Q. -- Delaney Yonchek. 3 A. -- I will -- I will represent to you -- 4 Q. Are they liars? 5 THE COURT REPORTER: One at a time.
2	Q. You think that's evidence? A. No, I think what it is is a pattern that speaks to the veracity of those claims, so it's not about --	6 BY MR. CARSON: 7 Q. Just answer the question. Are they -- 8 A. My answer is -- 9 THE COURT REPORTER: I can't hear the question.
3	Q. I'll repeat the question -- 4 A. Sure. 5 Q. -- since you avoided answering it. 6 Is there a single woman who has accused you of sexual harassment who you haven't called a liar?	10 BY MR. CARSON: 11 Q. We're going to get through this list and then we're going to be done. Is Caitriona Brady a liar?
4	MR. CAVALIER: Object to form. THE WITNESS: Mr. Carson --	12 MR. GOLD: You're going to be done in one more minute.
5	BY MR. CARSON: Q. You respond to every single -- A. -- you are -- Q. -- allegation -- A. -- you are saying that I categorized women as liars. Okay? I didn't say that in every	13 BY MR. CARSON: 14 Q. Is Caitriona Brady a liar? 15 A. Yes. 16 MR. CARSON: We're done the first deposition in one minute, not the second one.
6	claim. We went over a whole list of people today, and I didn't call everyone a liar.	17 BY MR. CARSON: 18 Q. Is Delaney Yonchek a liar?
7	Q. You called Lisa Barbounis a liar. A. She is. Q. You called Patricia McNulty a liar. A. She is. Q. You called Marnie Meyer a liar. A. I didn't call her a liar; I called her a fraud.	19 Page 385 20 A. In what context? 21 Q. Her allegations that she made. 22 A. Yes, that's why she dismissed her complaint.
8	Q. You called Caitriona Brady a liar. A. You said Caitriona Brady didn't accuse me of sexual harassment, so I don't know how to answer you.	23 Q. You think that's why she would say she dismissed her complaint, because it wasn't true? 24 A. I think that when she answered questions about the veracity of her complaint in her deposition that took place back in March when I was there in person, the first and the last time I've seen you, was quite revealing, Mr. Carson. She was asked whether or not she had said something that was in her complaint, and she said no, and then when Mr. Dave Walton asked her, well, you put it in your complaint, and she responded, oh, my lawyer did that.
9	Q. She accused you of discrimination and harassment based on her sex.	25 So, no, Mr. Carson, I think that in some cases these women had been manipulated by you and your law firm into delusions of grandeur based on your ability to try to get 40 percent of the 30 plus million dollars that you've been trying to acquire from our organization. So --
10	A. But you said earlier she didn't accuse me of harassment.	26 Q. So you're a victim. 27 A. -- it's not so much that they're liars. They have been duped and deceived by you and your colleagues.
11	Q. No, I said she didn't accuse you of sexual misconduct.	
12	MR. GOLD: Exactly two minutes to go here. Let's go. Two minutes. Wrap it up.	
13	BY MR. CARSON: Q. She accused you of discrimination and harassment based on her sex, and so does --	

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1	Q. So you're a victim in all this; is that	1	organization and hiring these people who
2	right?	2	at the end of the day ended up trying to
3	MR. GOLD: Let's go. Last	3	go out on a mission to be able to ruin
4	question.	4	all organization and to allow a law firm
5	THE WITNESS: I can't hear you.	5	like yours to go so far as to cause
6	THE COURT REPORTER: I can't hear	6	this. So if I take responsibility for
7	anyone right now.	7	this, Mr. Carson, the responsibility
8	BY MR. CARSON:	8	that I take is is that I didn't see this
9	Q. Are you the victim in all this?	9	coming earlier, and, had I, we wouldn't
10	A. The victim of what?	10	be here right now. It's not about
11	Q. Are you a victim?	11	allegations of harassment. What it's
12	A. Mr. Carson --	12	about is a concerted effort to try to
13	Q. Do you have any responsibility at all,	13	destroy us. And that, Mr. Carson, is my
14	personal responsibility, for any of the allegations	14	final answer.
15	that have been made regarding you.	15	(Simultaneous speakers.)
16	MR. GOLD: Objection --	16	BY MR. CARSON:
17	(Simultaneous speakers.)	17	Q. Which is why you are the victim, right?
18	THE COURT REPORTER: You're going	18	You're the victim.
19	to have to repeat the question.	19	THE COURT REPORTER: I can't hear
20	MR. CARSON: Guys, everyone keeps	20	anybody right now.
21	interrupting me. Like, stop.	21	MR. GOLD: Game over.
22	MR. GOLD: No one is interrupting	22	MR. CARSON: Well, I -- it's --
23	you at all.	23	well, we can't go off the record until
24	MR. CARSON: Yeah, every time I	24	we all say yes, right?
25	ask a question I hear five different	25	MR. GOLD: Game over. Last
	Page 389		Page 391
1	voices going and everyone has to stop	1	question.
2	talking.	2	BY MR. CARSON:
3	MR. GOLD: There's only one person	3	Q. So it's why -- that's why you're the
4	here and it's my voice. Objection. It	4	victim, right? Because of what you just said.
5	is a compound question.	5	MR. GOLD: No more questions, no
6	MR. CARSON: No, it's not.	6	more answers. We're done. Seven hours.
7	BY MR. CARSON:	7	We're done.
8	Q. The question is this. Do you take any	8	MR. CARSON: It hasn't been seven
9	responsibility at all? It's my last question.	9	hours.
10	MR. GOLD: That's the last	10	MR. GOLD: It has been seven
11	question.	11	hours. We agreed. It's now 8:07.
12	BY MR. CARSON:	12	We're done.
13	Q. Do you take any responsibility at all	13	MR. CARSON: All right. That's
14	for any of the allegations that any woman has ever	14	part one.
15	made against you for sexual harassment?	15	MR. GOLD: Have as many parts as
16	MR. CAVALIER: Object to form.	16	you need under the law.
17	BY MR. CARSON:	17	MR. CARSON: Thank you.
18	Q. Do you take any personal	18	Appreciate it.
19	responsibility, yes or no?	19	(A discussion was held off the record.)
20	MR. CAVALIER: Same objection.	20	THE VIDEO SPECIALIST: It is 8:08
21	THE WITNESS: Yes. The	21	p.m. Eastern. We are off the record.
22	responsibility that I take is one that I	22	- - -
23	allowed individuals to deceive, defraud,	23	(The proceedings concluded at 8:08 p.m.)
24	and to cause countless hours, countless	24	
25	days, countless years, of damage to this	25	

C E R T I F I C A T E

I HEREBY CERTIFY that the proceedings and evidence are contained fully and accurately, to the best of my ability, in the notes of testimony taken by me in the proceedings of the above cause, and that the copy is a correct transcript of the same.

---

Carrie A. Kaufman

Registered Professional Reporter  
Notary Public

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**constituted** (2)  
**construction** (1)  
**constructively** (1)  
**construe** (1)  
**consult** (1)  
**contact** (5)  
**contained** (1)  
**contempt** (2)  
**content** (1)  
**contents** (2)  
**context** (13)  
**contingency** (5)  
**continuation** (2)  
**continue** (13)  
**continued** (1)  
**continues** (2)  
**continuing** (2)  
**continuous** (1)  
**contract** (8)  
**contractors** (1)  
**contractual** (1)  
**control** (2)  
**controlled** (1)  
**conversation** (73)  
**conversations** (37)  
**conversion** (2)  
**converted** (1)  
**conveyed** (6)  
**convicted** (1)  
**co-opting** (1)

**coordinator** (1)  
**copied** (2)  
**copy** (7)  
**Corbett** (1)  
**coronavirus** (2)  
**corporate** (4)  
**corporation** (1)  
**corps** (1)  
**correct** (86)  
**correcting** (1)  
**correction** (1)  
**corrective** (1)  
**correspondence** (3)  
**cost** (3)  
**Costello** (2)  
**couch** (45)  
**couches** (2)  
**cough** (1)  
**Council** (3)  
**counsel** (84)  
**count** (3)  
**counterclaim** (17)  
**counterclaims** (1)  
**counterterrorism** (2)  
**countless** (5)  
**country** (3)  
**County** (6)  
**couple** (3)  
**course** (8)  
**COURT** (93)  
**courthouse** (1)  
**courtroom** (1)  
**cover** (2)  
**covered** (2)  
**covering** (2)  
**covers** (1)  
**coworker** (12)  
**coworkers** (1)  
**COZEN** (3)  
**crazy** (5)  
**created** (1)  
**creating** (1)  
**credibility** (1)  
**credible** (11)  
**credits** (1)  
**crew** (1)  
**criminal** (1)  
**criminals** (2)  
**criticize** (1)

cross (1)	December (12)	desk (2)	Discrimination (18)
cruise (1)	decibel (1)	desks (1)	discuss (3)
Cuba (1)	decide (1)	despair (1)	discussed (8)
culminated (2)	decided (2)	destroy (1)	discussing (5)
cup (1)	decision (3)	destroying (1)	discussion (14)
curious (1)	decisions (2)	destruction (1)	discussions (5)
current (1)	deconstructed (1)	detail (2)	dishonesty (2)
curtain (1)	deep (2)	detective (1)	dismissal (1)
custodian (1)	Defence (1)	determined (1)	dismissed (2)
custody (1)	defendant (2)	determining (1)	disparities (1)
cut (3)	Defendants (2)	detrimental (1)	disparity (1)
Cynwyd (1)	defending (1)	develop (1)	disproven (1)
<D>	Defense (4)	development (2)	dispute (4)
D.C (8)	defer (2)	device (1)	disqualification (1)
D.C. (1)	defined (2)	devices (2)	disqualified (1)
da (5)	definitely (4)	diagram (6)	disqualify (3)
damage (3)	definition (6)	dialogue (1)	dissonance (1)
damages (13)	defraud (3)	diametric (1)	distinction (1)
Dan (1)	defrauded (6)	die (1)	DISTRICT (11)
Daniel (107)	defrauding (4)	died (1)	districts (1)
Daniel's (1)	defrauds (1)	difference (7)	diversity (4)
Danny (44)	degree (6)	different (65)	divided (2)
dannythomas@tesco.co.uk (1)	Delaney (6)	differently (1)	docket (2)
Darren (1)	delivered (1)	difficult (14)	docs (3)
Dashti (3)	delusions (1)	difficulties (2)	doctor (1)
D-a-s-h-t-i (1)	demand (1)	dignity (2)	doctrine (2)
data (2)	demanding (2)	dining (2)	Document (73)
database (1)	demise (1)	dinner (14)	documentation (2)
date (41)	demoted (1)	direct (16)	documents (51)
dated (1)	denial (2)	directed (4)	doing (32)
dates (5)	deny (6)	directing (2)	dollar (5)
daughter (1)	dep (1)	direction (2)	dollars (9)
Dave (3)	department (1)	directive (1)	Dolly (1)
Davitch (1)	departure (3)	directly (9)	domestic (2)
day (24)	depending (2)	director (42)	Donald (1)
days (12)	depends (8)	directors (4)	donate (4)
de (2)	deployment (1)	disagree (9)	donates (1)
dead (1)	Deponent (3)	disagreed (1)	donation (1)
deal (6)	depose (1)	disagreement (1)	donations (1)
dealing (5)	deposing (1)	discharged (1)	donor (3)
deals (3)	deposition (39)	disciplinarian (1)	donors (2)
dealt (5)	deputy (16)	disclosures (2)	download (3)
dear (1)	DEREK (25)	disconnected (1)	downloaded (1)
debate (1)	descendents (1)	discontent (7)	downstairs (1)
debilitated (1)	describe (9)	discover (2)	downward (1)
deceive (1)	described (6)	discovered (1)	dozens (4)
deceived (1)	description (7)	discovery (16)	Dr (19)
	design (1)	discriminated (2)	draft (6)
	designed (1)	discriminating (2)	drafted (2)

<b>drafting</b> (5)	<b>either</b> (21)	<b>E-r-i-c</b> (1)	<b>explains</b> (1)
<b>Dragonetti</b> (1)	<b>EJ</b> (4)	<b>Erica</b> (1)	<b>explanation</b> (3)
<b>dress</b> (1)	<b>elderly</b> (1)	<b>Erie</b> (1)	<b>Exponent</b> (1)
<b>drill</b> (1)	<b>elected</b> (1)	<b>escape</b> (1)	<b>extended</b> (1)
<b>drink</b> (1)	<b>electronic</b> (7)	<b>escaping</b> (1)	<b>extensive</b> (2)
<b>drinking</b> (1)	<b>electronically</b> (1)	<b>especially</b> (2)	<b>extent</b> (6)
<b>drinks</b> (3)	<b>element</b> (2)	<b>ESQ</b> (4)	<b>external</b> (6)
<b>drive</b> (1)	<b>elementary</b> (1)	<b>established</b> (2)	<b>extra</b> (1)
<b>drop</b> (1)	<b>eleventh</b> (1)	<b>estimate</b> (2)	<b>eye</b> (1)
<b>drove</b> (1)	<b>Elliot</b> (4)	<b>et</b> (2)	< F >
<b>drug</b> (2)	<b>E-mail</b> (62)	<b>ethics</b> (1)	<b>fabricate</b> (2)
<b>drum</b> (1)	<b>e-mailed</b> (1)	<b>Europe</b> (3)	<b>fabricated</b> (3)
<b>drunk</b> (3)	<b>e-mails</b> (15)	<b>evening</b> (11)	<b>face</b> (3)
<b>dual</b> (2)	<b>Eman</b> (4)	<b>event</b> (9)	<b>Facebook</b> (2)
<b>due</b> (2)	<b>embarrass</b> (1)	<b>events</b> (9)	<b>facilitate</b> (3)
<b>DULY</b> (1)	<b>embassy</b> (2)	<b>eventual</b> (1)	<b>facilitated</b> (2)
<b>duped</b> (1)	<b>employed</b> (6)	<b>eventually</b> (5)	<b>fact</b> (13)
<b>duty</b> (5)	<b>employee</b> (21)	<b>Everest</b> (3)	<b>facts</b> (6)
<b>dynamics</b> (1)	<b>employees</b> (21)	<b>Everybody</b> (2)	<b>factual</b> (14)
 <b>&lt; E &gt;</b>	<b>employee's</b> (1)	<b>everybody's</b> (1)	<b>failed</b> (2)
<b>Eagles</b> (2)	<b>employer's</b> (1)	<b>evidence</b> (21)	<b>fair</b> (32)
<b>ear</b> (7)	<b>employment</b> (11)	<b>exact</b> (20)	<b>Fairless</b> (1)
<b>earlier</b> (7)	<b>enacted</b> (1)	<b>exactly</b> (12)	<b>fall</b> (2)
<b>early</b> (4)	<b>encounters</b> (1)	<b>exaggerating</b> (1)	<b>false</b> (17)
<b>ears</b> (1)	<b>ended</b> (4)	<b>Examination</b> (3)	<b>familiar</b> (4)
<b>Earth</b> (1)	<b>ends</b> (3)	<b>EXAMINED</b> (3)	<b>far</b> (5)
<b>easier</b> (2)	<b>engage</b> (1)	<b>example</b> (8)	<b>Faragher-Ellerth</b> (1)
<b>EAST</b> (122)	<b>engaged</b> (4)	<b>examples</b> (2)	<b>fashion</b> (1)
<b>EASTERN</b> (22)	<b>engaging</b> (2)	<b>exception</b> (1)	<b>fast</b> (3)
<b>easy</b> (2)	<b>engineered</b> (2)	<b>exchange</b> (1)	<b>father</b> (2)
<b>eat</b> (1)	<b>England</b> (1)	<b>exchanges</b> (1)	<b>February</b> (5)
<b>ECF</b> (5)	<b>English</b> (1)	<b>exchanging</b> (1)	<b>federated</b> (1)
<b>economic</b> (1)	<b>engrossed</b> (1)	<b>excited</b> (2)	<b>Federation</b> (7)
<b>e-discovery</b> (2)	<b>enlighten</b> (1)	<b>exclusively</b> (1)	<b>feedback</b> (1)
<b>editor</b> (3)	<b>enlightening</b> (1)	<b>excuse</b> (15)	<b>Feel</b> (3)
<b>editor-in-chief</b> (1)	<b>enlistment</b> (1)	<b>executive</b> (23)	<b>feelings</b> (1)
<b>edits</b> (1)	<b>entered</b> (2)	<b>exempt</b> (3)	<b>fees</b> (1)
<b>education</b> (7)	<b>entering</b> (1)	<b>exhaustive</b> (2)	<b>fell</b> (1)
<b>educational</b> (6)	<b>enterprise</b> (4)	<b>exhibit</b> (15)	<b>fellow</b> (1)
<b>EEO</b> (1)	<b>entire</b> (14)	<b>EXHIBITS</b> (4)	<b>felt</b> (7)
<b>EOC</b> (31)	<b>entirety</b> (4)	<b>exist</b> (5)	<b>female</b> (12)
<b>effect</b> (3)	<b>entrance</b> (1)	<b>exists</b> (3)	<b>fiduciary</b> (1)
<b>Effective</b> (1)	<b>entry</b> (1)	<b>expect</b> (1)	<b>field</b> (3)
<b>efficacy</b> (1)	<b>enumerated</b> (1)	<b>expected</b> (1)	<b>fifth</b> (3)
<b>effort</b> (2)	<b>Equal</b> (1)	<b>experience</b> (3)	<b>fight</b> (2)
<b>Egypt</b> (1)	<b>equality</b> (1)	<b>experiences</b> (1)	<b>figure</b> (2)
<b>Egyptian</b> (2)	<b>equated</b> (1)	<b>expert</b> (5)	<b>file</b> (18)
<b>eight</b> (12)	<b>equity</b> (1)	<b>explain</b> (26)	<b>filed</b> (52)
	<b>Eric</b> (1)	<b>explained</b> (3)	

files (6)	for-profit (1)	general (29)	groups (1)
filings (13)	FORUM (117)	generalized (1)	Group's (1)
fill (1)	Forum-related (3)	generally (11)	guard (2)
filled (2)	forums (1)	generation (1)	guard's (1)
film (1)	Forum's (11)	gentlemen (1)	guess (28)
final (3)	forward (10)	getting (22)	guest (1)
finances (1)	forwarded (4)	gist (1)	guide (1)
find (16)	found (20)	give (133)	gum (3)
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fine (19)	founders (1)	gives (3)	guys (36)
finish (25)	four (36)	giving (21)	guy's (1)
finished (1)	four-month (1)	Giza (1)	< H >
finishing (1)	fourth (4)	G-i-z-a (1)	hacker (9)
Fink (29)	frame (2)	glad (1)	hackers (1)
fire (1)	Frank (29)	glass (1)	Haifa (4)
fired (4)	Frankly (2)	go (161)	H-a-i-f-a (1)
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Firm (17)	Fraud (5)	goes (9)	H-a-l-e-v-i (1)
first (92)	fraudulent (3)	going (192)	half (8)
Fitzgerald (1)	free (3)	Golan (1)	hand (2)
five (45)	Friday (8)	GOLD (150)	handed (3)
five-minute (3)	friend (5)	GoldenComm (2)	handicapped (1)
flat (1)	friendly (2)	Gold's (2)	handle (4)
flight (1)	friends (3)	good (15)	handled (2)
flights (3)	front (14)	Goodman (22)	hands (1)
flirting (1)	frontlines (1)	Gosar (1)	handwritten (10)
fluctuates (1)	frustration (1)	gotten (1)	happen (28)
fly (6)	fuckin (3)	government (5)	happened (74)
folders (1)	full (8)	Governor (2)	happening (2)
folkstyle (1)	fully (1)	governors (10)	happens (4)
follow (3)	functional (1)	grabbed (1)	happy (16)
followed (1)	fundraising (3)	grade (4)	harass (3)
following (10)	funds (1)	gradually (1)	harassed (1)
FOLLOWS (1)	funneled (3)	graduate (2)	harassment (78)
food (1)	funny (4)	graduated (3)	hard (8)
foot (3)	further (4)	grandeur (1)	harmonious (1)
footnote (1)	future (3)	grant (12)	Harrisburg (1)
footprint (1)	< G >	granted (7)	Harrison (1)
force (2)	Gabrielle (6)	grants (1)	hated (1)
forced (3)	Galilee (1)	Grayson (1)	Hatzalah (1)
Forces (3)	Gallery (1)	great (5)	Hawaii (6)
foreign (1)	Gambill (1)	Greater (6)	head (4)
forensic (2)	game (10)	Green (2)	health (2)
forensically (1)	Gary (3)	GREGG (28)	hear (63)
forget (1)	Gavriel (1)	G-r-e-g-g (1)	heard (18)
form (18)	G-a-v-r-i-e-l (1)	grip (1)	hearing (1)
formal (8)	gay (1)	gross (1)	hearsay (1)
formative (1)	gender (9)	groundwork (3)	Hebrew (2)
former (2)		GROUP (10)	

Heights (1)	Huh (1)	incorrectly (1)	Interim (1)
held (16)	Human (4)	incredibly (1)	intern (2)
hell (1)	Hun (1)	incrementally (1)	internal (1)
he'll (2)	H-u-n (1)	incubator (1)	internally (1)
hello (1)	hundred (12)	INDEX (2)	international (2)
help (23)	hundreds (2)	indicate (3)	internationally (1)
helped (3)	Hunter (2)	indicates (1)	Interns (1)
helping (3)	hurricane (1)	indiscernible (4)	interpersonal (2)
helps (2)	hurt (1)	individual (10)	interpret (1)
Herzliya (2)	husband (6)	individuals (10)	interpretation (5)
H-e-r-z-l-i-y-a (1)	HVRSD (1)	inebriated (1)	interrogatory (1)
hey (6)	Hybros (1)	inflicted (1)	interrupted (2)
Hezbollah (2)	H-y-b-r-o-s (1)	informal (2)	interrupting (8)
HH (1)	hypothetical (5)	information (25)	intersected (1)
hierarchy (4)	< I >	informed (2)	intersecting (1)
High (8)	Ichud (1)	in-house (9)	interview (2)
higher (1)	IDC (2)	initial (4)	interviews (1)
highest (3)	idea (2)	initiated (6)	intimacy (2)
highlighted (3)	Identify (2)	initiation (1)	intimate (2)
Hillel (3)	identifying (1)	initiatives (4)	intimately (2)
Hills (1)	IDF (1)	innuendo (1)	intimidated (1)
Hilton (1)	ill (4)	in-person (2)	intricate (1)
hire (4)	illegal (1)	insofar (1)	introduced (3)
hired (5)	imagine (1)	instance (12)	investigated (4)
hiring (2)	imbroglio (1)	instances (3)	investigating (2)
history (4)	immediately (4)	instant (1)	investigation (16)
hit (1)	impacted (1)	instruct (2)	investigative (1)
hits (1)	implication (1)	instructed (3)	invitation (1)
hold (26)	implies (1)	instructing (1)	invite (2)
holding (1)	importance (2)	instruction (3)	invited (9)
Hollin (1)	important (6)	instructions (2)	invoke (5)
home (1)	impossible (2)	insult (1)	involve (1)
honest (2)	improper (3)	insurance (1)	involved (32)
honesty (2)	improve (1)	intelligence (1)	involvement (6)
honor (1)	improvement (3)	intense (1)	involving (4)
honorific (1)	inaccurate (3)	intensive (1)	Iran (2)
hope (2)	inappropriate (10)	intent (1)	ISIS (2)
Hopewell (2)	inappropriately (1)	intention (5)	Islamic (1)
horrible (1)	incident (14)	intentions (9)	isolate (1)
host (1)	incidents (1)	interaction (1)	Israel (39)
hostage (1)	include (6)	interactions (2)	Israeli (6)
hosts (1)	included (6)	intercourse (1)	Israel's (4)
hotel (19)	includes (2)	Interdisciplinary (1)	issue (3)
hotels (2)	including (10)	interest (8)	issues (14)
hour (1)	inclusion (3)	interested (1)	Italy (5)
hours (9)	inclusive (3)	interesting (3)	items (2)
house (2)	inconclusive (1)	interests (3)	its (2)
hover (2)	incorrect (11)	interface (1)	IVP (1)
huge (1)		interfering (1)	

< J >  
jail (3)  
James (1)  
Jamie (1)  
January (7)  
Jazmin (10)  
jcavalier@cozen.com (1)  
JCRC (14)  
j-e-l (1)  
Jersey (5)  
Jerusalem (2)  
Jewish (32)  
Jews (1)  
job (20)  
jobs (3)  
Joe (1)  
jog (2)  
joint (1)  
Jon (6)  
JONATHAN (3)  
Jordan (1)  
Joshua (1)  
journalist (1)  
journalist's (1)  
Judaic (1)  
Judge (4)  
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judges (1)  
July (8)  
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< K >  
Kalina (4)  
Karmiel (1)  
K-a-r-m-i-e-l (1)  
Kassam (12)  
Katz (2)  
Katzen (1)  
Kaufman (2)  
keep (25)  
keeping (4)  
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Kentucky (2)

kept (9)  
Kevin (1)  
kids (1)  
kill (1)  
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Kimball (2)  
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kindergarten (1)  
kinds (1)  
Kingdom (15)  
kitchen (16)  
knew (10)  
know (266)  
Knowing (1)  
knowledge (15)  
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< L >  
label (2)  
lacks (1)  
laid (2)  
lane (1)  
language (4)  
lap (4)  
Lara (12)  
Lara's (1)  
lastly (2)  
late (7)  
launched (1)  
Laura (34)  
LAW (30)  
Lawrence (1)  
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lawsuit (7)  
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lawyers (7)  
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LBEEOC (2)  
Lead (3)  
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league (2)  
Leah (8)  
learn (2)

learned (3)  
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leave (5)  
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Lebanon (1)  
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Lee (10)  
Lee's (1)  
leeway (1)  
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legal (26)  
legalized (2)  
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legs (1)  
Letter (71)  
letters (1)  
level (3)  
leveling (1)  
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Levin (1)  
Levy (5)  
Levy's (1)  
Lexington (1)  
Lezion (1)  
L-e-z-i-o-n (1)  
LGBT (1)  
liability (1)  
liaising (1)  
liaison (8)  
liar (14)  
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Libre (1)  
license (2)  
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life (17)  
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light (2)  
Ligonier (1)  
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limitations (1)  
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link (2)  
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liquor (1)  
LISA (141)  
Lisa's (3)  
list (17)  
listed (8)  
listen (10)  
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litany (1)  
literally (1)  
litigate (1)  
litigated (1)  
litigation (28)  
little (23)  
lives (6)  
living (7)  
local (1)  
location (1)  
lodging (1)  
log (1)  
Logan (2)  
logic (1)  
London (18)  
long (9)  
longer (4)  
look (54)  
looked (5)  
looking (12)  
looks (9)  
Los (2)  
losing (1)  
lost (2)  
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treasurer (1)	unenumerated (1)	versus (8)	watched (1)
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twice (6)	Urban (2)	Vladimir (1)	WhatsApp (1)
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types (2)	usually (3)	volunteered (3)	whisper (7)
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Uber (6)	vacations (1)	waiting (6)	WILLIAM (1)
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UK (7)	validity (1)	walking (4)	window (2)
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